

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF GEORGIA
3 MACON DIVISION
4

5 CIVIL ACTION NUMBER: 5:22-cv-00268-TES
6 ROGER PARKER, on his own behalf
7 and on behalf of all others similarly
8 situated,

9 Plaintiff,

10 vs.

11 PERDUE FOODS, LLC,
12 Defendant.
13
14

15 VIDEOTAPED DEPOSITION TESTIMONY OF
16 JAMES NORRIS
17 April 8, 2025
18 VIA REMOTE VIDEO-CONFERENCE
19
20

21 REPORTED BY:

22 Angela Smith McGalliard

23 Certified Realtime Reporter

24 Registered Professional

25 Reporter and Notary Public

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 2

I N D E X

EXAMINATION

	PG	LN
By Ms. Snow	6	13
By Ms. Wooten	108	5

PLAINTIFF'S EXHIBITS

	PG	LN
<u>Exhibit 36</u> Perdue Flock Visitation, Week 1 - Bates Perdue 006457	16	19
<u>Exhibit 37</u> Flock Advisor Training - Bates Perdue 001666	56	22
<u>Exhibit 38</u> PVP Bonus Checklist - Bates Perdue 006228	59	19
<u>Exhibit 39</u> Summer Readiness Checklist - Bates Perdue 004413	63	17
<u>Exhibit 40</u> Post Movement Requirements dated 8/10/2017 - Bates Perdue 006273	69	12
<u>Exhibit 41</u> Perdue Flock Visitation-Week 1 - Bates Perdue 006227	79	12

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 3

1 A P P E A R A N C E S
2 (ALL PARTIES ATTENDED REMOTELY)

3 FOR THE PLAINTIFF:

4 EMILY C. SNOW, ESQUIRE
5 JARRED A. KLORFEIN, ESQUIRE
6 CAPLAN COBB, LLC
7 75 Fourteenth Street, NE
8 Suite 2700
9 Atlanta, Georgia 30309

10 -and-

11 KRITIKA TARA DEB, ESQUIRE
12 FAIRMARK PARTNERS, LLP
13 1825 7th St NW, #821
14 Washington, DC 20001

15 FOR THE DEFENDANT:

16 VIRGINIA M. WOOTEN, ESQUIRE
17 OGLETREE, DEAKINS, NASH, SMOAK &
18 STEWART, P.C.
19 191 Peachtree Street NE
20 Suite 4800
21 Atlanta, Georgia 30303

22 ALSO PRESENT:

23 Walter Copeland - Perdue Foods

24 VIDEOGRAPHER:

25 Krishan Patel - Veritext

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 4

1 (Reporter disclosure made
2 pursuant to Article 8.b of the Rules and
3 Regulations of the Board of Court Reporting
4 of the Judicial Council of Georgia.)
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James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 5

1 I, Angela Smith McGalliard,
2 Registered Professional Reporter, Certified
3 Realtime Reporter and Certified Court
4 Reporter, duly licensed in the State of
5 Georgia, acting as Commissioner, certify
6 that on this date, as provided by the
7 Federal Rules of Civil Procedure, there
8 came before me via remote video-conference,
9 beginning at 9:29 a.m., James Norris,
10 witness in the above cause, for oral
11 examination, whereupon the following
12 proceedings were had:

13 VIDEOGRAPHER: Today's date is 09:29:47
14 April 8, 2025, and the time is 9:29 a.m. 09:29:49
15 This will be the remote videotaped 09:29:53
16 deposition of James Norris. 09:29:56

17 Will counsel please introduce 09:29:58
18 themselves and any objection to the witness 09:30:00
19 being sworn in remotely. 09:30:01

20 MS. SNOW: Good morning. This is 09:30:04
21 Emily Snow for Plaintiff Roger Dale Parker. 09:30:06
22 I'm joined by Jarred Klorfein also for 09:30:09
23 Plaintiff Roger Dale Parker. 09:30:13

24 MS. WOOTEN: Good morning. 09:30:16
25 Virginia Wooten with the firm Ogletree 09:30:17

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 6

1 Deakins representing the Defendant Perdue 09:30:19
2 Foods. Accompanying me today is the party 09:30:25
3 representative Mr. Walter Copeland. 09:30:26

4 VIDEOGRAPHER: Will the court
5 reporter please swear in the witness.
6 Thank you.

7 JAMES NORRIS,
8 being first duly sworn, was examined and
9 testified as follows: 09:30:41

10 COURT REPORTER: Thank you. We 09:30:41
11 can proceed. 09:30:43

12 EXAMINATION 09:30:43

13 BY MS. SNOW: 09:30:46

14 Q. Good morning, Mr. Norris. I just 09:30:46
15 introduced myself. But, again, my name is 09:30:51
16 Emily Snow, and I'm an attorney for the 09:30:52
17 Plaintiff in this case Dale Parker. My 09:30:53
18 first question for you is have you ever 09:30:55
19 given testimony in a deposition before? 09:30:58

20 A. No, I have not. 09:30:59

21 Q. Okay. Well, I'm going to start 09:31:02
22 by going over a few basic rules. We 09:31:04
23 shouldn't talk over one another; that can 09:31:07
24 be a little hard over zoom, but I'll do my 09:31:10
25 best. I'll wait to let you finish your 09:31:13

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 7

1 answer before asking my questions, and I'll 09:31:15
2 ask that you do the same, and let me finish 09:31:15
3 my question before answering; this will 09:31:19
4 make it easier for the court reporter to 09:31:19
5 take down what we're saying. 09:31:20

6 Does that sound good? 09:31:22

7 A. Yes. That's okay. 09:31:23

8 Q. It's also important that you give 09:31:25
9 a verbal response to each question that I 09:31:28
10 ask instead of just nodding your head, and 09:31:30
11 you just did that, which is great. This is 09:31:32
12 also so that the court reporter can write 09:31:34
13 down your answers. 09:31:36

14 Does that also make sense? 09:31:37

15 A. Yes. 09:31:38

16 Q. You can take a break whenever you 09:31:39
17 need to, but there's one exception to that: 09:31:40
18 We can't take a break if I've asked a 09:31:42
19 question and I'm waiting on your answer. 09:31:45
20 So we'll wait to take a break until you 09:31:48
21 answer the pending question. 09:31:51

22 Does that sound good? 09:31:53

23 A. Okay. 09:31:54

24 Q. If any question that I ask is 09:31:55
25 unclear, please let me know. If you don't 09:31:57

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 8

1 ask me to rephrase a question, I'll assume 09:31:59

2 that you understand the question. 09:32:02

3 Is that fair? 09:32:03

4 A. Yes. 09:32:04

5 Q. Because this is a remote 09:32:04

6 deposition, I have a few other questions 09:32:08

7 for you. Can you confirm that no one else 09:32:10

8 is in the room with you? 09:32:14

9 A. I can confirm that. I am by 09:32:15

10 myself; no one else is in the room. 09:32:18

11 Q. Thank you. Could you also 09:32:20

12 confirm that you won't communicate with 09:32:25

13 anyone by calling, emailing, text message, 09:32:29

14 or any other means while we're on the 09:32:32

15 Record? 09:32:34

16 A. Yes. 09:32:34

17 Q. Thank you. 09:32:35

18 And you don't have any other 09:32:35

19 windows or programs open on your computer? 09:32:37

20 A. No. Let me close this -- I had 09:32:40

21 my email open. No. 09:32:45

22 Q. So everything is closed now? 09:32:48

23 A. Yes. 09:32:49

24 Q. Thank you. 09:32:51

25 Is there any reason that you 09:32:54

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 9

1	can't fully and accurately answer questions	09:32:56
2	today?	09:32:58
3	A. No.	09:32:58
4	Q. No medications or anything like	09:33:01
5	that?	09:33:03
6	A. No medications.	09:33:03
7	Q. I'm going to use a few specific	09:33:06
8	terms during today's deposition, and I want	09:33:11
9	to talk about those. If I use the term	09:33:13
10	growers, producers, or farmers, can we have	09:33:15
11	the same understanding that I'm talking	09:33:18
12	about individuals who produce poultry for	09:33:20
13	Perdue?	09:33:25
14	A. Yes. That's fine.	09:33:26
15	Q. Do you use any other terms to	09:33:27
16	refer to those individuals?	09:33:29
17	A. No. Usually just farmer.	09:33:31
18	Q. Are you familiar with the farm	09:33:41
19	Hazel Lee?	09:33:45
20	A. Yes, I am.	09:33:46
21	Q. And that farm is in	09:33:47
22	Milledgeville, Georgia?	09:33:50
23	A. Yeah. I think that's the	09:33:50
24	address. It's been about eight years, but	09:33:52
25	I think it is a Milledgeville address.	09:33:56

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 10

1 Q. I understand that Mr. Parker was 09:33:58
2 also affiliated with a farm in Hillsboro, 09:34:00
3 Georgia. 09:34:04

4 A. Yes, he was -- or is. I don't 09:34:04
5 know if he still is. 09:34:11

6 Q. But to your knowledge, he was 09:34:12
7 affiliated with another farm in Hillsboro? 09:34:13

8 A. Yes. 09:34:16

9 Q. Did you oversee both farms? 09:34:16

10 A. Not at the same time, I don't 09:34:20
11 think I did. 09:34:26

12 Q. When did you oversee the farm in 09:34:27
13 Hillsboro? 09:34:30

14 A. I think about 2020. 09:34:30

15 Q. And how did you refer to that 09:34:38
16 farm? 09:34:40

17 A. The one in Hillsboro? I think 09:34:41
18 it's -- I think it's called Parker's 09:34:46
19 Poultry. 09:34:54

20 Q. But to confirm, Hazel Lee was the 09:34:54
21 farm in Milledgeville and Parker's Poultry 09:34:59
22 was the farm in Hillsboro? 09:35:04

23 A. Yes. 09:35:07

24 Q. So when I refer to Hazel Lee, I'm 09:35:08
25 talking about the farm in Milledgeville. 09:35:16

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 11

1 A. Okay. 09:35:18

2 Q. What did you do to prepare for 09:35:19
3 today's deposition? 09:35:20

4 A. Just talked to counsel yesterday 09:35:21
5 to tell me what to expect, as far as how 09:35:23
6 the video would be set up and there would 09:35:25
7 be a court reporter. 09:35:27

8 MS. WOOTEN: And let me -- Mr. 09:35:28
9 Norris, just so you know, I'd ask that you 09:35:31
10 don't disclose any of our conversations or 09:35:34
11 communications. But you can respond 09:35:36
12 generally to Ms. Snow's questions. 09:35:39

13 THE WITNESS: Okay. 09:35:42

14 MS. WOOTEN: Apologies for 09:35:46
15 interrupting, but wanted to just make sure 09:35:48
16 that was clear. 09:35:49

17 A. Okay. 09:35:50

18 Q. Yes. Mr. Norris, I'm not 09:35:50
19 interested in any of your conversations 09:35:51
20 with your attorney. 09:35:51

21 How long did you spend preparing? 09:35:53

22 A. I don't know. An hour or so. I 09:35:55
23 didn't -- I didn't time it or anything. 09:36:00

24 Q. About an hour? 09:36:03

25 A. Yeah. Maybe an hour, little over 09:36:04

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 12

1	an hour.	09:36:07
2	Q. Did you review any documents?	09:36:08
3	A. I saw some on screen, some	09:36:09
4	service reports, a few documents.	09:36:19
5	Q. Service reports, can you tell me,	09:36:23
6	what do you mean by that?	09:36:26
7	A. It's just a visitation form where	09:36:27
8	you visit the farm.	09:36:31
9	Q. Flock visitation reports?	09:36:32
10	A. Yeah.	09:36:34
11	Q. Did you review any other	09:36:35
12	documents?	09:36:37
13	A. I think it was just visitation	09:36:38
14	reports.	09:36:45
15	Q. Just those?	09:36:46
16	A. Yes.	09:36:49
17	Q. I'm going to start now with some	09:36:49
18	background questions about your work for	09:36:59
19	Perdue. So you started working for Perdue	09:37:01
20	in 2006; is that right?	09:37:03
21	A. Yes.	09:37:04
22	Q. Around the fall of that year?	09:37:05
23	A. Yes.	09:37:09
24	Q. And did you have any experience	09:37:11
25	in poultry production before you started	09:37:14

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 13

1 working at Perdue? 09:37:16

2 A. No. 09:37:17

3 Q. And what was your role when you 09:37:18
4 started with Perdue? 09:37:25

5 A. A flock -- Same role, flock 09:37:26
6 advisor. 09:37:31

7 Q. And you said same role, is that 09:37:32
8 the role you have now? 09:37:34

9 A. Yes. Current. Same thing. 09:37:35

10 Q. And so you're currently employed 09:37:36
11 with Perdue? 09:37:39

12 A. Yes. 09:37:39

13 Q. I'm mostly going to be asking 09:37:40
14 questions today about the 2012 to 2019 time 09:37:50
15 period. So you held the role of flock 09:37:53
16 advisor during that time period, you've 09:37:55
17 held the same role? 09:37:57

18 A. Yes. 09:37:58

19 Q. And can you tell me about that 09:37:58
20 role, what kind of responsibilities do you 09:38:00
21 have? 09:38:03

22 A. It's -- Basically it's letting 09:38:03
23 the farmer know placement schedules, catch 09:38:09
24 schedules, and ordering feed, and just 09:38:14
25 checking on the health of the birds and 09:38:18

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 14

1 welfare of the birds. 09:38:20

2 Q. So the health and welfare of the 09:38:22
3 birds, can you tell me about that? What 09:38:28
4 does that involve? 09:38:30

5 A. It's a lot. It's just -- Plain 09:38:30
6 and simple, it's the health and welfare of 09:38:40
7 the birds. It's just checking on the birds 09:38:43
8 daily or weekly, in my case, just to ensure 09:38:45
9 that they're, you know -- the welfare is 09:38:50
10 good. 09:38:56

11 Q. So is part of your job making 09:38:57
12 sure that disease didn't spread among 09:39:00
13 farms? 09:39:02

14 A. Yes. We have a lot of 09:39:03
15 biosecurity, you know, processes that we go 09:39:08
16 through, steps that we go through. 09:39:11

17 Q. And how are those steps 09:39:15
18 communicated to -- Sorry. Let me back up. 09:39:21

19 Are those biosecurity processes 09:39:24
20 and steps communicated to farmers? 09:39:26

21 A. Yes. It's a -- It's just a -- 09:39:32
22 It's kind of in the background. You know, 09:39:35
23 it's an ongoing biosecurity. It's just 09:39:36
24 things that I have to do to ensure the 09:39:41
25 security of the, you know, birds. 09:39:45

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 15

1 Q. You said things that you have to 09:39:50
2 do. Is there anything that farmers have to 09:39:52
3 do related to biosecurity? 09:39:56

4 A. Yes. They're aware of 09:40:02
5 biosecurities. And we have to show them -- 09:40:03
6 Before they ever grow birds, they're 09:40:06
7 trained on it, before they ever place birds 09:40:09
8 on a farm. 09:40:11

9 Q. They're trained on biosecurity? 09:40:12

10 A. Yes. They're shown a video about 09:40:15
11 biosecurity and . . . 09:40:19

12 Q. Do you show them that video? 09:40:26

13 A. If they're -- It would depend. 09:40:30
14 We used to do it in a group setting, we 09:40:35
15 would show all the farmers at meetings. 09:40:38
16 But now we do it on the farm, individually, 09:40:42
17 the flock advisor with the farmer. 09:40:45

18 Q. So the flock advisor shows the 09:40:46
19 biosecurity videos to the farmers? 09:40:49

20 A. Right. Correct. 09:40:52

21 Q. And that's part of the training 09:40:54
22 on biosecurity? 09:40:55

23 A. Yes. 09:40:56

24 Q. Is there any other part of the 09:40:57
25 training, other than the video? 09:40:59

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 16

1 A. No. 09:41:06

2 Q. It's just a video? 09:41:07

3 A. Yeah, just a video. And then 09:41:08

4 conversations about -- about the -- about 09:41:10

5 the farm; you know, if there's anything I 09:41:17

6 saw on the visit that was out of place, I 09:41:20

7 would point that out. But it's mainly just 09:41:24

8 a video. 09:41:26

9 Q. And did you show that video to 09:41:27

10 Hazel Lee? 09:41:32

11 A. I'm not sure. He might have been 09:41:38

12 at the training with another flock advisor. 09:41:40

13 I mean, I show it to farms that are on my 09:41:42

14 route, but if the route changes, I may or 09:41:45

15 may not have shown it to him. I don't -- I 09:41:48

16 don't remember. 09:42:01

17 (Plaintiff's Exhibit 09:42:01

18 36 was marked for 09:42:01

19 identification.) 09:42:01

20 Q. I am going to briefly share my 09:42:01

21 screen, if you'll give me one moment. 09:42:03

22 Mr. Norris, can you see what's on 09:42:31

23 my screen? 09:42:32

24 A. Yes. 09:42:33

25 Q. I am showing you what I am 09:42:34

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 17

1 marking as Plaintiff's Exhibit 36. This 09:42:35
2 document is marked with Perdue -- the Bates 09:42:37
3 stamp is Perdue 006457. And Mr. Norris, 09:42:43
4 you may hear me refer today to Bates 09:42:53
5 stamps, those are numbers that are added 09:42:58
6 during the litigation process to help us 09:43:00
7 identify documents. It's this number right 09:43:00
8 here (indicating) at the bottom of the 09:43:02
9 document. 09:43:03
10 Have you seen this document 09:43:04
11 before? 09:43:05
12 A. I -- Yes, I have. That would 09:43:05
13 have been in 2018, but, yes. 09:43:07
14 Q. And what is this document? 09:43:14
15 A. It's a visitation report for -- 09:43:15
16 Looks like a visitation report for Hazel 09:43:17
17 Lee, the first week. 09:43:20
18 Q. And you mentioned the date, it's 09:43:22
19 April 16, 2018? 09:43:24
20 A. Yes. 09:43:28
21 Q. And at the bottom of the 09:43:29
22 document, there's a place for a flock 09:43:34
23 advisor signature, and that's your 09:43:37
24 signature? 09:43:39
25 A. Yes. 09:43:39

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 18

1 Q. And the first row at the top of 09:43:40
2 this document is a section called 09:43:45
3 biosecurity. 09:43:51

4 Do you see that? 09:43:52

5 A. Yes. 09:43:53

6 Q. There's a section here for 09:43:54
7 comments/recommendations. And the first 09:43:55
8 comment here says: Did biosecurity/poultry 09:43:58
9 welfare training with farm help today. 09:44:03

10 Do you see that? 09:44:06

11 A. Yes. 09:44:07

12 Q. Does this refresh your 09:44:07
13 recollection as to whether you might have 09:44:09
14 administered biosecurity training to Hazel 09:44:12
15 Lee? 09:44:14

16 A. By Hazel Lee, do you mean Dale 09:44:14
17 Parker? 09:44:17

18 Q. I mean the individuals who worked 09:44:18
19 at Hazel Lee. 09:44:21

20 A. Yes. Well, it says with farm 09:44:22
21 help. So he could have had a new helper on 09:44:25
22 the farm that was going to be working 09:44:30
23 there, and that might have been who I 09:44:32
24 trained there. It says farm help; it 09:44:40
25 doesn't say farmer or owner, so that would 09:44:43

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 19

1 be me guessing that it's farm help. 09:44:45

2 Q. So you're clarifying that this 09:44:47

3 may not have meant you administered 09:44:49

4 training to Dale Parker personally, but 09:44:51

5 that you administered it to the individuals 09:44:54

6 on his farm? 09:44:55

7 A. Right. 09:44:57

8 Q. Okay. I'm going to stop sharing 09:44:57

9 my screen. 09:45:03

10 And why did -- What was your 09:45:04

11 understanding of the purpose of that 09:45:07

12 training? 09:45:08

13 A. Well, we do biosecurity with all 09:45:09

14 farms before they ever place birds. So 09:45:15

15 it's just so that they're aware of the 09:45:18

16 biosecurity that's needed for the birds, as 09:45:25

17 far as the farm and the farmer is 09:45:29

18 concerned, and Perdue. 09:45:32

19 Q. You said you do the training 09:45:33

20 before you ever place birds. Is it a 09:45:34

21 requirement to have birds -- to do the 09:45:37

22 training before you have birds placed? 09:45:40

23 MS. WOOTEN: Object to form. You 09:45:42

24 can answer. 09:45:44

25 A. Well, it's done once a year. And 09:45:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 20

1 it's done -- It's not done every flock, 09:45:46
2 every time they place birds. It's just 09:45:49
3 done once -- It's done once at the 09:45:51
4 beginning of when they place birds 09:45:54
5 originally on the farm, and then yearly 09:45:56
6 it's reviewed once a year. It's a little 09:45:58
7 ten-minute video. It's not a -- You know, 09:46:01
8 it's not done every flock; it's done once a 09:46:08
9 year. 09:46:13

10 Q. Well, is it done the first time a 09:46:13
11 flock is -- Let's say -- Let me back up. 09:46:17

12 The first time a Perdue flock is 09:46:21
13 placed on a farm, is the training shown to 09:46:26
14 the farmer? 09:46:31

15 A. Yes. 09:46:32

16 Q. So it's a requirement for the 09:46:32
17 first flock? 09:46:35

18 A. Yes. Before birds are placed, 09:46:36
19 they're trained in biosecurity. 09:46:40

20 Q. And I'm sorry I interrupted you. 09:46:41

21 If a farmer wants to have Perdue 09:46:44
22 birds placed on his firm, he has to do the 09:46:48
23 biosecurity training? 09:46:50

24 A. Yes. 09:46:51

25 Q. So Hazel Lee had to do the 09:46:53

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 21

1 biosecurity training to have birds placed 09:47:02

2 at Hazel Lee? 09:47:05

3 A. Yes. Yes. 09:47:06

4 Q. I want to return now to some 09:47:07

5 questions about your role as a flock 09:47:15

6 advisor. 09:47:17

7 Was part of your job ensuring 09:47:18

8 that animals were taken care of? 09:47:20

9 A. By animals, you mean Perdue 09:47:22

10 animals, the birds, the chickens, yes. 09:47:29

11 Q. And how did you accomplish that 09:47:32

12 part of your job? 09:47:33

13 A. It's a combination of just 09:47:34

14 visiting the farm once a week and looking 09:47:41

15 at the birds. 09:47:45

16 Q. You mentioned visiting the farms 09:47:46

17 once a week, was that your typical schedule 09:47:54

18 for visiting farms? 09:47:57

19 A. Yes. 09:47:58

20 Q. And was part of your job ensuring 09:47:59

21 that all of Perdue's policies were being 09:48:10

22 followed? 09:48:12

23 MS. WOOTEN: Object to form. You 09:48:15

24 can answer. 09:48:17

25 A. No. Not all policies. I mean, I 09:48:17

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 22

1 -- I don't deal with everything throughout 09:48:20
2 the company, just basically the 09:48:23
3 bird-related stuff. 09:48:28

4 Q. And what were the bird-related 09:48:29
5 policies that you were responsible for? 09:48:31

6 A. Just the general welfare of the 09:48:32
7 birds -- The biosecurity of the birds and 09:48:36
8 the bird comfort or bird welfare. 09:48:38

9 Q. And did Perdue have policies 09:48:41
10 related to bird comfort and bird welfare? 09:48:53

11 A. Yes. 09:48:56

12 Q. What were some of those policies? 09:48:59

13 A. There's a lot. I mean, there's 09:49:01
14 -- I don't know where you want to start. 09:49:07
15 But it's -- It's just a -- It's mainly just 09:49:09
16 -- A lot of it is just the temperature in 09:49:20
17 the house, the -- and that affects the bird 09:49:22
18 comfort, either being too warm or too cool. 09:49:26

19 Q. So the temperature requirements 09:49:30
20 might be one example? 09:49:33

21 A. Yes. 09:49:34

22 Q. What about lighting? 09:49:36

23 A. Yes. 09:49:38

24 Q. And did you train farmers on the 09:49:53
25 temperature and the lighting policies? 09:49:57

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 23

1 A. Well, it's not really training -- 09:50:00

2 MS. WOOTEN: Sorry. I just 09:50:04

3 sometimes I have to put an objection on the 09:50:06

4 Record. I don't mean to interrupt you to 09:50:08

5 stop the flow, but I just want to note the 09:50:10

6 objection. You can answer. Sorry for 09:50:12

7 interrupting. 09:50:14

8 A. It's not really training, it's 09:50:15

9 just a light schedule or a temperature 09:50:19

10 chart or a water pressure guideline. 09:50:27

11 Q. So you mentioned a light 09:50:31

12 schedule, a temperature chart, a water 09:50:36

13 pressure guideline, were those written 09:50:38

14 down? 09:50:41

15 A. Yes. 09:50:41

16 Q. And how did you give those to the 09:50:42

17 farmers? 09:50:48

18 A. They are written down or they're 09:50:49

19 posted -- printed and posted on the wall at 09:50:53

20 the chicken house. 09:50:58

21 Q. And do you have -- 09:51:00

22 A. And there's a book -- There's 09:51:01

23 also a book, with all the papers in it 09:51:03

24 also, like a little binder, little 09:51:06

25 three-ring notebook. 09:51:12

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 24

1 Q. And that book was given to 09:51:13
2 farmers? 09:51:15

3 A. Yes. There's one at each farm. 09:51:16

4 Q. And were those guidelines posted 09:51:18
5 at Hazel Lee? 09:51:24

6 A. Yes. 09:51:24

7 Q. And was that book given to Mr. 09:51:25
8 Parker? 09:51:33

9 A. It should be in the control room 09:51:33
10 at house number 1 at the farm. That's 09:51:34
11 generally where it's at at each farm, is it 09:51:38
12 at house number 1. 09:51:41

13 Q. And did you expect the farmers to 09:51:43
14 comply with all these guidelines? 09:51:46

15 MS. WOOTEN: Object to form. You 09:51:49
16 can answer. 09:51:50

17 A. Yeah. That's sort of the -- The 09:51:50
18 goal is to grow a good chicken and here are 09:51:58
19 some pointers on how to do that. So it's 09:52:02
20 sort of a roadmap to -- to keep the birds 09:52:05
21 comfortable and keep them alive and keep 09:52:10
22 them, you know, secure. 09:52:12

23 Q. So you did expect the farmers to 09:52:13
24 comply with them? 09:52:18

25 A. Yes. 09:52:18

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 25

1 Q. And that included Mr. Parker? 09:52:19

2 A. Yes. 09:52:22

3 Q. Was part of your job ensuring 09:52:30
4 that farmers followed all applicable laws? 09:52:32

5 MS. WOOTEN: Object to form. You 09:52:35
6 can answer. 09:52:37

7 A. Laws? I -- You mean traffic 09:52:37
8 laws? There's a lot of laws, so what laws 09:52:44
9 specifically? 09:52:47

10 Q. Laws that pertain -- that might 09:52:48
11 pertain to this industry. 09:52:52

12 A. I mean, I don't -- I don't know 09:52:54
13 of any laws, specifically, that I was 09:52:58
14 trying to enforce a law. 09:53:01

15 Q. And if you're unsure, that's 09:53:13
16 okay. 09:53:16

17 A. Yeah. 09:53:16

18 Q. Was part of your job ensuring 09:53:17
19 that farmers produce a successful flock for 09:53:19
20 Perdue? 09:53:22

21 A. To do the -- To provide -- To 09:53:23
22 grow the bird until it was able to be 09:53:28
23 caught and brought to market, yes. 09:53:31

24 Q. And how did you do that? 09:53:33

25 A. It's mainly, the farmer is doing 09:53:37

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 26

1 the doing. I'm just checking on the bird 09:53:45
2 health or they would communicate with me 09:53:48
3 any questions or concerns they had about -- 09:53:50
4 about the chickens. 09:53:53

5 Q. What were your qualifications for 09:53:55
6 -- What are your qualifications for your 09:54:05
7 role as flock advisor? 09:54:08

8 A. Just the Perdue training is -- 09:54:09
9 You know, it's kind of on-the-job training. 09:54:15
10 I don't have a degree or a -- a poultry 09:54:19
11 science degree or an animal science degree. 09:54:22

12 Q. And you mentioned you didn't have 09:54:25
13 prior experience in poultry production? 09:54:27

14 A. No. But a lot of it is just -- 09:54:29
15 is scheduling and communicating the 09:54:33
16 placement times or catch times. So a lot 09:54:36
17 of it is just communicating those -- that 09:54:38
18 information to the farm. 09:54:41

19 Q. And you've used those terms 09:54:44
20 before, placement and catch. Can you tell 09:54:46
21 me what those mean? 09:54:48

22 A. Placement is just generally just 09:54:50
23 a day that the baby birds arrive on the 09:54:53
24 farm for that flock. 09:54:58

25 Q. And what about catch? 09:54:59

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 27

1 A. Well, catch is just a day that 09:55:00
2 they catch them to harvest them. And 09:55:03
3 that's known as a flock, from placement to 09:55:08
4 catch, that would -- it's what we call an 09:55:11
5 entire flock. 09:55:14

6 Q. Have your responsibilities as a 09:55:16
7 flock advisor changed over time? 09:55:25

8 A. I mean, everything changes, so 09:55:27
9 yes. 09:55:32

10 Q. How have they changed? 09:55:33

11 A. We'll have different farms, 09:55:35
12 different farmers, different equipment, 09:55:41
13 different -- different controllers, 09:55:47
14 different -- you know, that's -- So the 09:55:49
15 equipment changes, it's constantly 09:55:52
16 changing; the equipment is different. 09:55:54

17 Q. And that's because different 09:56:00
18 farms have different equipment? 09:56:02

19 A. Yes. Different farms have 09:56:03
20 different equipment. And sometimes each 09:56:05
21 house on individual farms have different 09:56:15
22 equipment. You can have six houses and 09:56:17
23 they all have something different in each 09:56:20
24 house. 09:56:23

25 Q. So the primary way your role has 09:56:23

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 28

1 changed is by serving different farms? 09:56:25

2 A. Yeah. Different farms, different 09:56:27

3 farmers, different locations. I mean, I 09:56:29

4 have different routes, so I may have went 09:56:32

5 to Milledgeville or I may be going to 09:56:34

6 Montezuma or Barnesville. So it changes 09:56:37

7 because we change routes, so we see 09:56:41

8 different farms and different farmers. 09:56:43

9 Q. Have your general 09:56:45

10 responsibilities stayed the same? 09:56:47

11 A. Yes. It's just more -- just more 09:56:48

12 of it. Just more -- you know, more farms. 09:56:54

13 Q. And in your role as flock 09:57:10

14 advisor, are you responsible for a certain 09:57:12

15 region? 09:57:14

16 A. Yeah. Well, we call it a route, 09:57:14

17 but it's -- Yes. I have a certain number 09:57:16

18 of farms, but they could be in different 09:57:18

19 ZIP codes, you know. 09:57:21

20 Q. And what route are you 09:57:22

21 responsible for right now? 09:57:24

22 A. Well, we don't really have a name 09:57:27

23 or a number for it. But I just have a -- I 09:57:29

24 currently have a route of about twelve 09:57:33

25 farms that I visit. 09:57:36

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 29

1 Q. In that 2012 to 2019 time frame, 09:57:38

2 Hazel Lee was on your route? 09:57:45

3 A. Yes. 09:57:48

4 Q. And if a farm is on your route, 09:57:48

5 it means that you are responsible for it? 09:57:55

6 A. Well, it means that I -- Yes. 09:57:57

7 They call me if they have questions or 09:57:59

8 needs or concerns, or wanting to know 09:58:01

9 placement times or catch times. 09:58:04

10 Q. Were there twelve farms on your 09:58:06

11 route in that time frame? 09:58:12

12 A. Probably at least twelve. 09:58:14

13 Q. Did you spend more time at 09:58:16

14 certain farms, over others? 09:58:18

15 A. Yes. 09:58:21

16 Q. Was Hazel Lee one of those farms? 09:58:23

17 A. It was further away from -- you 09:58:27

18 know, as far as the route goes, 09:58:35

19 distance-wise, so I think it was the 09:58:38

20 furthest away from -- so I spent a lot of 09:58:39

21 time driving over there. 09:58:43

22 Q. So you didn't spend as much time 09:58:44

23 at Hazel Lee because it was further away? 09:58:52

24 A. I don't really know, more or 09:58:54

25 less. Just try to be there at least once a 09:58:59

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 30

1 week to check on things. 09:59:01

2 Q. And does your route change? 09:59:02

3 A. Well, yeah. I don't have the 09:59:11

4 same route now. I mean, this is 20- -- Is 09:59:13

5 that what you're asking? 09:59:17

6 Q. Maybe that was a confusing 09:59:19

7 question. 09:59:20

8 You mentioned that your route 09:59:21

9 consists of certain farms. How did the 09:59:22

10 farms on your route change? Is that a 09:59:26

11 determination by Perdue? Who makes that 09:59:28

12 decision? 09:59:30

13 A. It would usually change if we had 09:59:30

14 a personnel change, if we had a new hire or 09:59:32

15 if someone retired or left, then we would 09:59:37

16 take that route and divide it up. We had a 09:59:41

17 person that retired, so when she retired, 09:59:44

18 we took that route, and we got an 09:59:48

19 additional farm or two. Or if they hired 09:59:51

20 someone else, they may change a route. 09:59:53

21 Q. Who did you report to in that 09:59:56

22 2012 to 2019 time frame? 10:00:04

23 A. I think it depends on -- 2012, 10:00:06

24 probably Dan Roberts. But then also, 10:00:12

25 later, would have been Kathryn. I'm not 10:00:17

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 31

1 sure when Kathryn Mizell started with 10:00:19

2 Perdue. 10:00:26

3 Q. Anyone else? 10:00:27

4 A. That's who I directly report to. 10:00:28

5 Q. And what were their roles? 10:00:32

6 A. They're an area supervisor. 10:00:36

7 Q. Did anyone report to you? 10:00:40

8 A. No. I have no -- nobody that 10:00:45

9 reports to me. 10:00:49

10 Q. You said they were your direct 10:00:49

11 reports, would -- did you report to anyone 10:00:52

12 else indirectly? 10:00:57

13 A. Maybe above that, you may have 10:00:58

14 some -- you know, my communication -- by 10:01:03

15 reports, you mean emails or telephone 10:01:07

16 calls. So, yes, there's other people I 10:01:10

17 communicate with, but not on a regular 10:01:12

18 basis. I mean, maybe, I might go weeks 10:01:15

19 without talking to the grow-out manager or 10:01:20

20 the -- anyone above -- above Dan or 10:01:23

21 Kathryn. 10:01:29

22 Q. You mentioned that you visited 10:01:30

23 the farms on your route at least once a 10:01:38

24 week; right? 10:01:40

25 A. Well, generally, a week and 10:01:41

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 32

1 sometimes it may -- you may -- it may be 10:01:45

2 two weeks before you get back over there. 10:01:48

3 Q. And you documented your visits to 10:01:50
4 the farms? 10:01:53

5 A. Yes. 10:01:54

6 Q. And earlier we looked at a flock 10:01:54
7 visitation report. 10:01:59

8 A. (Witness nods head in the 10:02:00
9 affirmative.) 10:02:03

10 Q. Just a reminder, can you give it 10:02:03
11 out loud for me? 10:02:08

12 A. Yes. 10:02:09

13 Q. Thank you. 10:02:10

14 So that's one kind of 10:02:10
15 documentation you would use for your 10:02:12
16 visits? 10:02:14

17 A. Yes. 10:02:14

18 Q. What was the purpose of those 10:02:15
19 reports? 10:02:17

20 A. Well, just the -- To be sure that 10:02:17
21 I was there, someone was looking at the 10:02:22
22 chickens. Just to check on the status of 10:02:24
23 how they were doing. 10:02:27

24 Q. You said to make sure someone was 10:02:28
25 looking at the chickens, so Perdue likes 10:02:33

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 33

1 somebody to -- 10:02:36

2 A. Yeah. A Perdue representative, 10:02:37

3 yes. 10:02:39

4 MS. WOOTEN: I just note an 10:02:40

5 objection to form. Mr. Norris, just a 10:02:41

6 reminder to allow counsel to finish her 10:02:44

7 question before responding so everything is 10:02:49

8 clear on the Record. 10:02:51

9 THE WITNESS: Okay. 10:02:52

10 Q. I think you answered my question, 10:02:53

11 but just to be sure: Perdue liked having a 10:02:54

12 representative keep an eye on the chickens 10:02:57

13 and the reports made sure of that? 10:03:00

14 MS. WOOTEN: Same objection. You 10:03:03

15 can answer. 10:03:04

16 A. Yes. 10:03:04

17 Q. Did the report serve any other 10:03:05

18 purpose? 10:03:09

19 A. Yeah. You make notes on there if 10:03:09

20 there was things that were -- needed to be 10:03:14

21 changed or, you know, corrected. 10:03:17

22 Q. And if you made a note about 10:03:24

23 something that needed to be changed or 10:03:25

24 corrected, did you expect the farmer to 10:03:27

25 change or correct that thing? 10:03:30

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 34

1 A. Yes. 10:03:32

2 Q. What did you do with the reports 10:03:33
3 when they were complete? 10:03:39

4 A. Give a copy to the farm or the 10:03:41
5 farmer. 10:03:45

6 Q. Did you give a copy to your 10:03:45
7 supervisor? 10:03:48

8 A. Well, yes, weekly or monthly, you 10:03:49
9 would turn them in, you know. 10:03:54

10 Q. Any other documentation you 10:04:00
11 created when you visited farms? 10:04:03

12 A. No. 10:04:05

13 Q. What about farm visitor logs? 10:04:07

14 A. Well, that's really just for 10:04:12
15 biosecurity. But it's a log that I sign 10:04:15
16 into when I visit a farm. 10:04:20

17 Q. So the purpose was for 10:04:23
18 biosecurity? 10:04:25

19 A. Yes. 10:04:25

20 Q. That's it, no other purpose? 10:04:26

21 A. No. That's what it says at the 10:04:31
22 top of the form is a biosecurity form. 10:04:36
23 It's just so we know who's there; if there 10:04:39
24 was an illness or an outbreak of something, 10:04:42
25 we would -- we can look and say who was 10:04:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 35

1 here -- who was here previously. 10:04:46

2 Q. And is that form produced by 10:04:47

3 Perdue? 10:04:50

4 A. Yes. 10:04:51

5 Q. And are the farmers required to 10:04:52

6 keep that form on their farms? 10:04:56

7 A. It's really just a Perdue form. 10:04:58

8 They don't sign it or sign into the farm 10:05:02

9 when they visit. It's for Perdue personnel 10:05:05

10 or outside personnel that visit the farm, 10:05:10

11 so they're not a visitor. It's a visitor 10:05:13

12 log. 10:05:17

13 Q. I understand. 10:05:17

14 What did you do with those logs? 10:05:21

15 A. I would sign in at the farm; when 10:05:24

16 I would arrive at the farm, I would sign in 10:05:29

17 to the visitor's log. 10:05:32

18 Q. Did you provide a copy to your 10:05:33

19 supervisor or anything like that? 10:05:36

20 A. We do save those visitor's logs. 10:05:37

21 Q. We talked about flock visitation 10:05:51

22 sheets and farm visitor logs. Were these 10:05:55

23 documents about farms maintained in any 10:05:58

24 particular way, perhaps in a grower file? 10:06:01

25 A. I'm not sure that all flock 10:06:03

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 36

1 advisors save them. It's really just for 10:06:06
2 during the flock that they're -- they're 10:06:11
3 used. And say -- You know, so we know who 10:06:13
4 was there during that flock, during that 10:06:18
5 grow-out of that particular flock. 10:06:20

6 Q. Okay. I have a few questions now 10:06:23
7 about some of Perdue's policies. And we've 10:06:28
8 talked about some of these already, but I'm 10:06:31
9 going to ask you about a few others. And 10:06:32
10 your role as a flock advisor requires you 10:06:35
11 to be familiar with Perdue's policies; 10:06:39
12 right? 10:06:42

13 A. Yes. 10:06:42

14 Q. And we talked about biosecurity 10:06:42
15 and animal welfare policies already; 10:06:48
16 correct? 10:06:52

17 A. Yes. 10:06:52

18 Q. Did Perdue have any policies 10:06:52
19 about requiring certain farming equipment 10:06:56
20 on farms? 10:06:59

21 A. Just the equipment just to feed 10:07:01
22 -- that pertains to the chickens, yes. 10:07:08

23 Q. What was that policy? 10:07:17

24 A. Well, it was just to help them -- 10:07:18
25 have equipment to feed and water the birds 10:07:24

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 37

1 and to keep them comfortable. I mean, it's 10:07:26

2 farm equipment. 10:07:28

3 Q. Did Perdue require certain types 10:07:29

4 of farm equipment? 10:07:31

5 MS. WOOTEN: Object to form. You 10:07:32

6 can answer. 10:07:33

7 A. No. Not -- Not certain brand 10:07:33

8 names or manufacturers, no. 10:07:38

9 Q. And what about a policy on rodent 10:07:42

10 control, did Perdue have one of those? 10:07:52

11 A. Yes. We have to have rodent 10:07:56

12 control on the farms, for biosecurity and 10:07:59

13 for -- for damage to the -- to the farms; 10:08:02

14 there could be electrical damage or rodent 10:08:06

15 -- you know, rodent damage. 10:08:09

16 Q. What was the purpose of those 10:08:12

17 policies? 10:08:17

18 MS. WOOTEN: Object to form. 10:08:18

19 A. The policy is just to have rodent 10:08:19

20 control in place for each farm and for each 10:08:24

21 house on the farm. 10:08:28

22 Q. Was it for the welfare of the 10:08:30

23 birds? 10:08:33

24 A. Yes. So there's biosecurity and 10:08:34

25 -- and for welfare, but mainly biosecurity. 10:08:38

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 38

1 You don't want any other animals, including 10:08:46
2 rodents. 10:08:50

3 Q. And that policy was provided to 10:08:51
4 Hazel Lee? 10:08:54

5 MS. WOOTEN: Object to form. You 10:08:55
6 can answer. 10:08:56

7 A. Yes. 10:08:56

8 Q. And did you expect the farmer -- 10:08:57
9 Mr. Parker or the other individuals at 10:09:02
10 Hazel Lee to comply with it? 10:09:03

11 A. Yes. 10:09:05

12 Q. What about seasonal guidelines? 10:09:05
13 And by that I mean, did Perdue require its 10:09:15
14 farmers to prepare in a certain way for 10:09:18
15 each season, like winter or summer? 10:09:21

16 MS. WOOTEN: Object to form. You 10:09:24
17 can answer. 10:09:26

18 A. Yes. Yes, we have -- you know, a 10:09:26
19 winter temperature and we have a summer 10:09:29
20 temperature. Different settings for the 10:09:33
21 summer versus the winter. 10:09:35

22 Q. And are those settings written 10:09:37
23 down somewhere? 10:09:39

24 A. Yes. In the control rooms in 10:09:39
25 each house. 10:09:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 39

1 Q. And were they in the control 10:09:45

2 rooms at Hazel Lee? 10:09:46

3 A. Yes. 10:09:47

4 Q. Were there any other documents 10:09:48

5 used as part of that process? 10:09:57

6 A. No. Not that -- Not for 10:09:59

7 temperatures, no. 10:10:02

8 Q. What about a checklist for 10:10:03

9 winterization or for summer readiness? 10:10:06

10 A. Yes. 10:10:15

11 Q. And what did these temperature 10:10:16

12 settings or these readiness checklists, 10:10:17

13 what purpose do they serve? 10:10:21

14 A. Well, just for -- to keep the 10:10:23

15 birds comfortable, depending on the 10:10:25

16 weather. 10:10:27

17 Q. So keeping the birds comfortable, 10:10:27

18 that's also an animal welfare policy? 10:10:29

19 A. Yes. 10:10:32

20 Q. Do these policy -- Are these 10:10:33

21 policies related to any biosecurity 10:10:37

22 purpose? 10:10:39

23 MS. WOOTEN: Object to form. You 10:10:41

24 can answer. 10:10:42

25 A. Well, it's mainly just a welfare 10:10:43

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 40

1 of the . . . 10:10:50

2 Q. Mainly just animal welfare? 10:10:53

3 A. Yes. 10:10:56

4 Q. And you expected Hazel Lee to 10:10:56

5 follow the temperature settings and the 10:10:58

6 readiness process? 10:11:00

7 A. Yes. 10:11:02

8 Q. What if Hazel Lee or another farm 10:11:03

9 didn't follow that process? 10:11:11

10 A. They would not have a good flock; 10:11:12

11 the birds would not perform, they will not 10:11:16

12 gain the weight that they need and the 10:11:21

13 target -- they would be underweight if they 10:11:24

14 didn't have the correct -- you know, if 10:11:27

15 they weren't ready for that weather. 10:11:29

16 Q. So the birds would be 10:11:34

17 underweight? 10:11:36

18 A. Right. 10:11:36

19 Q. Would there be any other 10:11:37

20 consequences? 10:11:38

21 A. Well, of course, if they're 10:11:39

22 underweight, then the farm will not receive 10:11:46

23 as much money because the weight -- they 10:11:48

24 get paid by the pound. 10:11:50

25 Q. On that subject, how does Perdue 10:11:54

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 41

1 determine the payment owed to growers? 10:12:09

2 A. That would be determined in their 10:12:13

3 payment schedules that they sign with 10:12:19

4 Perdue. 10:12:21

5 Q. So farmers sign a payment 10:12:22

6 schedule? 10:12:25

7 A. Yes. 10:12:26

8 Q. Are they able to negotiate their 10:12:29

9 pay? 10:12:34

10 A. I don't know. 10:12:36

11 Q. Is that payment schedule 10:12:39

12 dependent on each flock? 10:12:43

13 A. The payment schedule is the same 10:12:46

14 per pound, per flock. 10:12:50

15 Q. You said it's the same per pound. 10:12:55

16 Can you explain to me how it works based on 10:12:59

17 the weight of the birds? 10:13:01

18 A. Yes. It's the weight of the bird 10:13:06

19 times the payment, and that's how they 10:13:12

20 determine their pay. 10:13:14

21 Q. So Perdue determines the payment 10:13:16

22 owed to farmers by calculating the weight 10:13:21

23 of the bird times the payment amount, and 10:13:23

24 that calculation is set forth in the 10:13:29

25 payment schedule? 10:13:31

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 42

1 A. Yes. It's . . . 10:13:32

2 Q. Did you have something to add? 10:13:43

3 A. It's an agreed-to amount that the 10:13:44

4 farmer signs to agree to take birds. And 10:13:46

5 they receive the X amount of dollars per 10:13:50

6 pound. 10:13:54

7 Q. Do you know when the farmer signs 10:13:54

8 that schedule? 10:13:57

9 A. They sign it when they initially 10:13:58

10 grow birds; the very first time they ever 10:14:02

11 place -- before they place birds, they sign 10:14:05

12 a producer -- a producer agreement, and 10:14:08

13 then there's a payment schedule signed 10:14:11

14 then. 10:14:16

15 Q. So they sign it as part of their 10:14:16

16 poultry producer agreement with Perdue? 10:14:19

17 A. Yes. 10:14:21

18 Q. Are you familiar with the term 10:14:23

19 six-flock average? 10:14:25

20 A. Yes. 10:14:26

21 Q. What does that refer to? 10:14:27

22 A. It refers to their six-flock 10:14:29

23 average, is what it is. 10:14:36

24 Q. Can you put it another way? 10:14:38

25 A. It's -- It's a six-flock average 10:14:39

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 43

1 of the previous six flocks that they've 10:14:44
2 grown for Perdue. So as they grow flocks, 10:14:48
3 that number changes, as they grow 10:14:54
4 additional flocks. 10:15:00

5 So a person on their very first 10:15:01
6 flock would have a one-flock average, they 10:15:04
7 wouldn't have a six-flock average. And 10:15:06
8 then the second flock, it's really a 10:15:08
9 two-flock average. But it's just an 10:15:12
10 average of the last six flocks, previous 10:15:14
11 six flocks. 10:15:17

12 Q. And does the average refer to the 10:15:18
13 weight of the birds or is it the weight of 10:15:20
14 the birds times the payment amount? 10:15:21

15 A. It's an average of how they did 10:15:23
16 with the flock or the previous six flocks. 10:15:28

17 Q. Of how they did, in terms of the 10:15:33
18 weight of the birds? 10:15:35

19 A. Yes. It has the -- Well, it will 10:15:37
20 have the farm weight, the total weight, the 10:15:40
21 average weight per flock. 10:15:42

22 Q. Okay. And would Perdue sometimes 10:15:45
23 use the six-flock average to determine a 10:15:50
24 farmer's compensation? 10:15:53

25 A. I think they do, yes. I don't 10:15:55

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 44

1 pay -- I'm not involved with the payment 10:15:59
2 schedules or the -- or the settlements that 10:16:02
3 are paid to farmers. That's above what I 10:16:06
4 -- what I do. 10:16:10

5 Q. So you're not involved at all 10:16:11
6 with farmer compensation? 10:16:13

7 A. No. I don't -- I don't do the 10:16:16
8 settlements. 10:16:20

9 Q. You don't -- I'm sorry. Go 10:16:20
10 ahead. 10:16:23

11 A. No, I don't do the settlements, 10:16:23
12 the checks, if you want to call it that. 10:16:26

13 Q. You don't review settlement 10:16:30
14 statements? 10:16:32

15 A. Well, I may -- I may read them so 10:16:32
16 -- if the farmer wants to know how they 10:16:37
17 did. But I don't produce those or enter 10:16:41
18 numbers into those. 10:16:45

19 Q. You might read them at the 10:16:46
20 request of a farmer, for example? 10:16:48

21 A. Yes. 10:16:49

22 Q. Is that the only way you would be 10:16:55
23 involved in something related to 10:16:57
24 compensation? 10:17:00

25 A. You know, I will see -- I'll see 10:17:01

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 45

1 the settlements, you know, for the farms 10:17:03
2 that are on my route, to know how they -- 10:17:08
3 how much they're getting paid for that 10:17:12
4 flock. And I usually will communicate the 10:17:14
5 dollar amount, because that's usually what 10:17:17
6 they want to know is how much am I getting 10:17:19
7 paid. And I can -- I can go and look. 10:17:22
8 Once everything is settled, the settlement 10:17:25
9 for that week, I can look at that dollar 10:17:27
10 amount and let them know how much is being 10:17:30
11 deposited into the bank. 10:17:33
12 Q. You might review the settlement 10:17:34
13 statements, but you're not involved at all 10:17:37
14 with the numbers that go into them? 10:17:38
15 A. No. 10:17:40
16 Q. To go back to that six-flock 10:17:41
17 average, when would -- 10:17:48
18 (Off-the-Record 10:17:48
19 discussion held.) 10:18:06
20 Q. To go back to that six-flock 10:18:06
21 average, when would that be used to 10:18:08
22 determine farmer compensation? 10:18:10
23 A. Usually used if there's a -- 10:18:11
24 let's say a disaster, say they lose a house 10:18:17
25 of birds to a storm or something, they'll 10:18:20

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 46

1 pay them the six-flock average, the farm is 10:18:25
2 paid their six-flock average. So we give 10:18:28
3 them what they're normally making. 10:18:31

4 Q. So it's typically only if there's 10:18:32
5 some kind of disaster or something outside 10:18:35
6 the farmer's control? 10:18:37

7 A. Yeah. Or if we -- Yes. 10:18:39

8 Q. Any other circumstances? 10:18:42

9 A. If there's a biosecurity, you 10:18:46
10 know, problem -- We haven't had this here, 10:18:50
11 but I'm sure if they had bird flu 10:18:55
12 somewhere, they would pay that farm their 10:18:57
13 six-flock average, if we had to, you know, 10:19:02
14 do something in the case of bird flu. 10:19:05

15 Q. Could a farmer -- Sorry, let me 10:19:16
16 rephrase my question. 10:19:20

17 You talked earlier about farms 10:19:21
18 having different equipment; right? 10:19:23

19 A. Yes. 10:19:24

20 Q. Assuming that two farms had the 10:19:29
21 same equipment, is the only way that one 10:19:32
22 farm could receive higher pay than the 10:19:34
23 other farm would be that their birds 10:19:37
24 weighed more? 10:19:39

25 A. Yes. It's paid by weight. But 10:19:40

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 47

1 not all two -- not all farms are the same. 10:19:49

2 So you have -- There's no two farms 10:19:54

3 identical to each other. 10:19:56

4 Q. Is there any other way that a 10:19:59

5 farmer could receive higher pay if they had 10:20:01

6 the same equipment as their neighbor? 10:20:03

7 A. Are you referring to tier pay? 10:20:06

8 Q. I do have some questions about 10:20:15

9 tier pay. It sounds like -- It sounds like 10:20:17

10 you're familiar with that system? 10:20:21

11 A. The base pay is the same, they 10:20:22

12 get paid the same base pay per pound. 10:20:25

13 Q. Well, tell me about the tier pay. 10:20:28

14 Tell me how that works. 10:20:34

15 A. Well, there's different -- 10:20:35

16 There's different tiers of housing. So we 10:20:38

17 have a tier one, tier two, tier three, tier 10:20:48

18 four. 10:20:52

19 Q. And what does each tier mean? 10:20:53

20 A. Like the tier one is an older -- 10:20:56

21 an older farm, and the tier four being a 10:20:59

22 newer farm. 10:21:03

23 Q. And how does each tier impact 10:21:05

24 farmer pay? 10:21:07

25 A. Well, it's an additional pay. I 10:21:08

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 48

1 don't know that it -- that it's an impact. 10:21:15
2 But it's a big -- They all receive the base 10:21:18
3 pay per pound, and then a house with newer 10:21:22
4 or better or more equipment will receive 10:21:26
5 compensation for their equipment, because 10:21:29
6 that equipment allows for more bird 10:21:34
7 comfort. It usually refers to air speed. 10:21:37

8 Q. So tiers one through four receive 10:21:42
9 the same base pay, but tier one receives 10:21:44
10 lower pay than tier four, additional pay? 10:21:47

11 A. Well, they all start with the 10:21:52
12 same base pay, and then the tier one 10:21:55
13 receives additional pay, and then the tier 10:21:58
14 two receives additional pay. So we're not 10:22:02
15 taking money away, we're adding money for 10:22:05
16 the tier levels. 10:22:09

17 Q. But tier two receives more 10:22:11
18 additional pay than tier one, for example? 10:22:15

19 A. Yes. 10:22:17

20 Q. Who decides the farmer can move 10:22:17
21 to a higher tier? 10:22:21

22 A. Usually they are -- The farm is 10:22:24
23 built -- We still have tier-one farms. 10:22:27
24 We're -- They're not required to be a two, 10:22:34
25 three, four. I mean, we still have a tier 10:22:38

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 49

1 one that grows chickens for us. 10:22:40

2 Q. So a farmer can decline to move 10:22:42
3 to a higher tier; they don't have to move 10:22:48
4 up if they don't want to? 10:22:51

5 A. No, they don't. They don't have 10:22:53
6 to move up. 10:22:55

7 Q. But if they do want to move up, 10:22:56
8 how does that process work? 10:22:59

9 A. You would talk with the housing 10:23:01
10 manager for our complex and see what would 10:23:07
11 be needed to get to the next level. 10:23:12

12 Q. Does Perdue have specific 10:23:17
13 requirements about equipment or setting up 10:23:22
14 houses that apply to all of the tiers? 10:23:26

15 A. Yeah. There's a base -- It's 10:23:29
16 basically all houses are at least tier one, 10:23:32
17 obviously. And then there are additional 10:23:36
18 things that can be done to make you a tier 10:23:40
19 two, tier three, or four. 10:23:44

20 Q. Could a farmer use their houses 10:23:48
21 to grow birds for multiple companies at the 10:23:53
22 same time? 10:23:56

23 A. Not at the same time. 10:23:56

24 Q. What about on a rotating 10:24:06
25 schedule, so grow one flock for Perdue and 10:24:08

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 50

1 one flock for a different company? 10:24:11

2 A. Yes. That's possible. 10:24:13

3 Q. So that would be allowed? 10:24:14

4 A. Yeah. It would be allowed. We 10:24:16

5 don't -- I don't think we have any in this 10:24:22

6 complex that does that. 10:24:24

7 Q. What do you mean by "this 10:24:26

8 complex"? 10:24:28

9 A. Well, I mean in the Perry area or 10:24:28

10 Forsyth, Georgia. 10:24:32

11 Q. Do you know of any in any area? 10:24:33

12 A. You mean any with Perdue? 10:24:36

13 Q. Yeah. 10:24:41

14 A. I don't -- I only know about the 10:24:42

15 Forsyth area. 10:24:47

16 Q. Could farmers use their houses to 10:24:49

17 raise birds for Perdue and raise other 10:24:54

18 animals? 10:24:57

19 A. No. It's a poultry house. 10:24:57

20 Q. Because it would raise 10:25:06

21 biosecurity concerns? 10:25:08

22 A. Yes. 10:25:09

23 Q. Would it raise biosecurity 10:25:09

24 concerns for a farmer to do a rotating 10:25:12

25 schedule to raise one flock for another 10:25:14

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 51

1 company and then one flock for Perdue? 10:25:18

2 A. Yes, it might. But we don't -- I 10:25:20

3 don't have any that rotate for other 10:25:26

4 companies. 10:25:28

5 Q. Is it fair to say that if a 10:25:29

6 farmer has a contract with Perdue, their 10:25:36

7 poultry houses can only be used to grow 10:25:38

8 birds for Perdue? 10:25:41

9 MS. WOOTEN: Object to form. You 10:25:43

10 can answer. 10:25:44

11 A. As long as there are Perdue birds 10:25:44

12 there, there can't be other company -- 10:25:51

13 other types of animals grown there. 10:25:53

14 Q. So to do that rotating schedule 10:25:55

15 we just talked about, their contract with 10:25:59

16 Perdue would have to be over? 10:26:01

17 MS. WOOTEN: Object to form. You 10:26:03

18 can answer. 10:26:06

19 A. We don't have any rotating 10:26:06

20 contracts that I know of. 10:26:08

21 Q. So that doesn't exist? 10:26:09

22 MS. WOOTEN: Object to form. You 10:26:13

23 can answer. 10:26:15

24 A. Not that I know of in Forsyth. 10:26:15

25 Q. Did you, as a flock advisor, ever 10:26:19

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 52

1	receive quarterly bonuses?	10:26:25
2	A. Yes.	10:26:27
3	Q. How are those bonuses calculated?	10:26:28
4	A. They're -- The bonus is based on	10:26:35
5	mortality, livability, the feed conversion	10:26:43
6	of the birds.	10:26:48
7	Q. What about farm improvements?	10:26:49
8	A. We don't -- We don't -- We're not	10:26:53
9	paying for any farm improvement bonuses.	10:26:58
10	Q. That's not a factor in the	10:27:00
11	bonuses?	10:27:03
12	A. I don't receive farm improvement	10:27:03
13	bonuses now.	10:27:16
14	Q. What about in the past?	10:27:17
15	A. Yes.	10:27:18
16	Q. And in the past, what did farm	10:27:19
17	improvements refer to in a bonus?	10:27:21
18	A. A farm improvement would be a --	10:27:23
19	if someone went from -- it's usually an air	10:27:29
20	speed upgrade or a new -- new drinkers or	10:27:32
21	an improvement to the farm.	10:27:42
22	Q. Would it if someone moved from	10:27:45
23	tier one to tier two?	10:27:50
24	A. It could be.	10:27:52
25	Q. So if you have a farmer who moves	10:27:53

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 53

1 tiers, you also benefit? 10:27:55

2 MS. WOOTEN: Object to form. You 10:27:58

3 can answer. 10:27:59

4 A. I may not -- I may or may not. I 10:27:59

5 don't receive any benefit or any bonus for 10:28:09

6 that now. 10:28:13

7 Q. But in the past? 10:28:13

8 A. In the past, if someone did an 10:28:15

9 air speed improvement, then yes. 10:28:19

10 Q. And air speed improvements are 10:28:25

11 part of the tiers? 10:28:30

12 A. That's part of it, yeah. 10:28:31

13 Q. And do you know why that changed? 10:28:32

14 You said that's not the case anymore. 10:28:33

15 A. Well, most of our houses or at -- 10:28:36

16 Most of our houses are at tier three or 10:28:40

17 tier four. There's not really any more 10:28:42

18 improvements to be had. 10:28:47

19 So most are at tier three are 10:28:49

20 going to stay at a tier three and most that 10:28:51

21 are tier four were built -- a lot of houses 10:28:55

22 are built as the current tier that they're 10:28:58

23 at. If they were built a tier four, 10:29:00

24 they're still a tier four. 10:29:02

25 Q. So the fact that you're not 10:29:04

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 54

1 receiving farm improvement bonuses anymore 10:29:06
2 is more so because of the tiers of the farm 10:29:10
3 on your route? 10:29:12

4 MS. WOOTEN: Object to form. You 10:29:15
5 can answer. 10:29:16

6 A. Yes. I -- I don't -- I don't 10:29:16
7 know why we don't receive that bonus for 10:29:21
8 that anymore, other than the farms were 10:29:23
9 pretty much staying the same. 10:29:26

10 Q. We've been talking about payment 10:29:29
11 and compensation. I'm going to go back to 10:29:53
12 a few questions about training. 10:29:55

13 Did you undergo training on 10:29:58
14 Perdue's policies and its requirements for 10:30:00
15 its farmers? 10:30:02

16 MS. WOOTEN: Object to form. You 10:30:03
17 can answer. 10:30:04

18 A. You mean the biosecurity training 10:30:04
19 or the animal welfare training? I do -- 10:30:10
20 get the same training that the farmers get. 10:30:19
21 You know it's a yearly or an annual 10:30:22
22 training. 10:30:24

23 Q. Do you get any additional 10:30:24
24 training, beyond what the farmers receive? 10:30:25

25 A. Sometimes a controller training, 10:30:29

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 55

1 a class on how to set up a controller, the 10:30:33
2 controller being the computer in the house 10:30:39
3 that monitors the temperatures. 10:30:40

4 Q. And who trained you for these 10:30:46
5 trainings? 10:30:48

6 A. Usually it's an outside -- a 10:30:49
7 vendor that has that particular -- the 10:30:56
8 manufacturer of that particular equipment, 10:30:58
9 whether it was a Rotem or a Chore Time, 10:31:00
10 these are just controllers that we have 10:31:07
11 that -- We have different ones. You can 10:31:10
12 put whatever you want in a house, different 10:31:12
13 manufacturers. So usually it's a 10:31:14
14 manufacturer that makes that product, would 10:31:16
15 show how to make changes within the -- 10:31:19
16 within the controller. 10:31:22

17 Q. What about the training you 10:31:23
18 received on biosecurity and animal welfare, 10:31:26
19 who gave you those trainings? 10:31:29

20 A. Perdue. 10:31:31

21 Q. And were these trainings 10:31:35
22 required? 10:31:37

23 A. Yeah. Anyone that handles the 10:31:37
24 live chickens has to do the biosecurity. 10:31:41

25 Q. Are you familiar with Best 10:31:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 56

1 Management Practices, or BMPs? 10:31:49

2 A. Yes. 10:31:51

3 Q. What are those? 10:31:51

4 A. BMPs are just ways to achieve -- 10:31:52

5 It's just the best management -- best 10:32:01

6 practice is what it is, is literally what 10:32:03

7 it's described; the best practice for the 10:32:07

8 farm or for the birds. 10:32:10

9 Q. Are the BMPs in the area of 10:32:12

10 biosecurity and animal welfare or are they 10:32:19

11 in other areas? 10:32:22

12 A. Yes. It's biosecurity and it's 10:32:23

13 -- And, of course, the rest is all, you 10:32:27

14 know, animal welfare. So it's usually that 10:32:29

15 you're going to hear that consistently is 10:32:31

16 biosecurity and animal welfare, because 10:32:35

17 they kind of go hand in hand. If you don't 10:32:38

18 have biosecurity, you don't have animal 10:32:42

19 welfare either. 10:32:44

20 (Plaintiff's Exhibit 10:32:44

21 37 was marked for 10:32:44

22 identification.) 10:32:53

23 Q. I am going to share my screen 10:32:53

24 again, so give me one moment. 10:32:55

25 Okay. Mr. Norris, can you see my 10:33:09

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 57

1 screen? 10:33:13

2 A. Yes, I see it. 10:33:13

3 Q. I am showing you what I am 10:33:14

4 marking as Plaintiff's Exhibit 37. This 10:33:16

5 document begins with Bates number Perdue 10:33:19

6 001666. 10:33:23

7 Mr. Norris, have you seen this 10:33:27

8 document before? 10:33:33

9 A. I don't -- I don't think I have. 10:33:33

10 Q. Are you -- 10:33:35

11 A. I don't train flock advisors, so 10:33:41

12 I don't -- Maybe this is, you know, an area 10:33:44

13 supervisor would have this and train. 10:33:47

14 Is there a revision date? Is 10:33:49

15 there a date on the bottom of that? 10:33:51

16 Q. I don't believe so. 10:33:54

17 A. Okay. So . . . 10:33:56

18 Q. That was going to be my next 10:33:59

19 question is, looking at the contents, is 10:34:01

20 this used to train flock advisors or is 10:34:06

21 this for flock advisors to train growers? 10:34:08

22 MS. WOOTEN: Objection. Form. 10:34:11

23 You can answer. 10:34:13

24 A. No. It looks like it's -- I'd 10:34:13

25 have to read it all, but it looks like it's 10:34:15

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 58

1 for training a flock advisor. 10:34:18

2 Q. Did you -- If I scroll through 10:34:23

3 this document, you'll see that it has week 10:34:26

4 one, week two, week three, and if I scroll 10:34:29

5 to the bottom, it goes through week eight. 10:34:33

6 Did you participate in any sort 10:34:35

7 of eight-week training as a flock advisor? 10:34:37

8 A. Yes. It's sort of always an 10:34:39

9 ongoing training, but initially there's -- 10:34:43

10 there's training. 10:34:49

11 Q. But it's safe to say that you did 10:34:52

12 not administer an eight-week training to 10:34:54

13 farmers? 10:34:57

14 A. No. 10:34:58

15 Q. Okay. Are you familiar with the 10:35:05

16 Poultry Care Process Verified Program? 10:35:07

17 A. Yes. 10:35:11

18 Q. Sometimes it's abbreviated as the 10:35:11

19 PVP program? 10:35:18

20 A. Yes. 10:35:20

21 Q. What is that program? 10:35:21

22 A. Well, it's a -- it's a process to 10:35:22

23 verify our program. I mean, it's kind of 10:35:27

24 redundant, but that's what it is. It's 10:35:32

25 basically a checklist of things that are 10:35:35

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 59

1 supposed to be done on the farm, throughout 10:35:39
2 the flock. 10:35:43

3 Q. Did you administer training to 10:35:44
4 farmers on that program? 10:35:48

5 A. It's not really a lot of 10:35:51
6 training, it's more of just a checklist of 10:35:53
7 things that need to be done each flock, and 10:35:56
8 they were -- they were paid a bonus, each 10:36:01
9 farm, each flock, if they -- they do -- 10:36:06
10 There's about ten things on the list, and 10:36:09
11 if they do all ten, they get the PVP bonus, 10:36:11
12 they get additional pay. 10:36:15

13 Q. You mentioned the PVP bonus, can 10:36:27
14 you tell me what that is? 10:36:30

15 A. Well, it's a bonus that's paid to 10:36:32
16 the farm. 10:36:34

17 (Plaintiff's Exhibit 10:36:34
18 38 was marked for 10:36:34
19 identification.) 10:36:44

20 Q. I am showing you what I am 10:36:44
21 marking as Plaintiff's Exhibit 38. You can 10:36:45
22 see my screen; right? 10:36:48

23 A. Yes. 10:36:49

24 Q. This is Perdue 006228. 10:36:49
25 Have you seen this document 10:37:00

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 60

1	before, Mr. Norris?	10:37:01
2	A. Yes.	10:37:03
3	Q. What is this?	10:37:05
4	A. It's a PVP Bonus Checklist.	10:37:06
5	Q. And what is this document used	10:37:14
6	for?	10:37:15
7	A. It's used for -- You check off	10:37:15
8	the things on the list, if the farm	10:37:18
9	participates and does all this stuff, then	10:37:21
10	they will receive additional pay.	10:37:24
11	Q. Were the things -- items on this	10:37:29
12	list optional?	10:37:32
13	MS. WOOTEN: Object to form. You	10:37:34
14	can answer.	10:37:36
15	A. Well, if they did not do it, they	10:37:36
16	would not receive the pay. So it was at	10:37:41
17	their option. If they -- You know, if they	10:37:43
18	didn't do everything on that list, then	10:37:48
19	they wouldn't receive the additional pay.	10:37:50
20	Q. So these were prerequisites to	10:37:53
21	receiving that additional pay?	10:38:00
22	A. Right. If they did not do the --	10:38:02
23	Let's say that four-inch black pipe, if	10:38:07
24	they did not use the black pipe, they	10:38:10
25	wouldn't receive the bonus money for that	10:38:12

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 61

1 flock. 10:38:17

2 Q. And for this particular flock, 10:38:20
3 which is flock 47, and I'll represent to 10:38:24
4 you that this was produced to us as a 10:38:32
5 document pertaining to Hazel Lee, that 10:38:34
6 Hazel Lee did receive the bonus? 10:38:36

7 A. Yes. 10:38:38

8 Q. Okay. 10:38:48

9 MS. WOOTEN: Ms. Snow, I don't 10:38:48
10 know when you might have a good stopping 10:38:50
11 point for a break. But at some point it 10:38:52
12 might be nice to take just a quick break, 10:38:54
13 whenever it's convenient for you. 10:38:57

14 MS. SNOW: Certainly. We can 10:38:58
15 take a break right now. 10:39:00

16 Mr. Norris, would you like to 10:39:03
17 take a brief break? 10:39:05

18 THE WITNESS: Yes. That's fine. 10:39:08

19 MS. SNOW: How about a ten-minute 10:39:09
20 break? We can go off the Record. 10:39:11

21 VIDEOGRAPHER: The time is 10:39 10:39:15
22 a.m. We're off the Record. 10:39:19

23 (Recess taken.) 10:39:22

24 VIDEOGRAPHER: The time is 10:51 10:51:00
25 a.m. We're on the Record. 10:51:04

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 62

1 Q. Mr. Norris, we've talked a lot 10:51:09
2 about biosecurity. Did Perdue have a 10:51:11
3 specific biosecurity policy? 10:51:13

4 MS. WOOTEN: Object to form. You 10:51:20
5 can answer. 10:51:22

6 A. If I'm understanding the 10:51:22
7 question, are you asking me if we have 10:51:24
8 biosecurity procedures to do? Yes, we do. 10:51:26

9 Q. Are you familiar with something 10:51:32
10 called the biosecurity "Never Evers" and 10:51:35
11 "Dedicated Tos"? 10:51:38

12 A. Yes. 10:51:39

13 Q. And that's part of the 10:51:39
14 biosecurity security policies and 10:51:47
15 procedures we've been talking about? 10:51:50

16 A. Yes. I have to adhere to those 10:51:51
17 "Never Evers". 10:51:59

18 Q. You have to adhere to them? 10:52:00

19 A. Yes. 10:52:02

20 Q. What about farmers, do they have 10:52:02
21 to adhere to them? 10:52:05

22 A. It would be in their best 10:52:06
23 interest, yes. For the health of the 10:52:09
24 birds, yes. 10:52:12

25 Q. And were those biosecurity "Never 10:52:13

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 63

1 Evers" and "Dedicated Tos", were they 10:52:17
2 provided to Hazel Lee? 10:52:20

3 A. Yes. I believe that's on the 10:52:25
4 wall in the control rooms at every farm, at 10:52:27
5 every farm, not just Hazel Lee. 10:52:29

6 Q. And you expected Hazel Lee to 10:52:31
7 adhere to those? 10:52:33

8 A. Yes. 10:52:35

9 MS. WOOTEN: Object to form. You 10:52:35
10 can answer. 10:52:36

11 Q. We talked earlier about some of 10:52:36
12 the seasonal guidelines and seasonal 10:52:51
13 preparation that you would do with farmers, 10:52:54
14 and I want to talk about one in particular. 10:53:01

15 (Plaintiff's Exhibit 10:53:01
16 39 was marked for 10:53:01
17 identification.) 10:53:06

18 Q. I'm going to share my screen with 10:53:06
19 you. I am showing you what I am marking 10:53:07
20 Plaintiff's Exhibit 38. This document is 10:53:09
21 labeled Bates number Perdue 004413. 10:53:12

22 MS. WOOTEN: I'm sorry to 10:53:28
23 interject or interrupt, but I think the 10:53:29
24 next exhibit is 39? 10:53:34

25 COURT REPORTER: I was just about 10:53:36

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 64

1 to clarify. 10:53:38

2 MS. SNOW: This is Plaintiff's 10:53:38

3 Exhibit 39. Thank you. 10:53:39

4 MS. WOOTEN: No problem. 10:53:41

5 Q. Mr. Norris, have you seen this 10:53:42

6 document before? 10:53:44

7 A. Yes. 10:53:45

8 Q. What is this? 10:53:45

9 A. It's a Summer Readiness Checklist 10:53:46

10 is what it says at the top there. But it's 10:53:49

11 basically a checklist to get ready for 10:53:52

12 summer. It's like going on a road trip, 10:53:55

13 you want to make sure your car is ready, 10:53:58

14 you want to make sure the farm is prepared 10:54:00

15 for hot weather. 10:54:02

16 Q. And there's a place here for 10:54:03

17 farmer signature, do you see that? 10:54:05

18 A. Yes. 10:54:07

19 Q. So you expected the farmers to 10:54:07

20 complete the items on this list? 10:54:12

21 A. You would -- You would give them 10:54:14

22 the list and -- it was really we would just 10:54:15

23 hand them the list and go: Here's the 10:54:22

24 checklist of what, you know, you need to 10:54:24

25 work on in order to be ready for summer. 10:54:26

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 65

1 You wouldn't always receive that list back 10:54:29
2 from the farmer. 10:54:31
3 Sometimes they would, you know, 10:54:33
4 throw it on the dashboard of the truck or 10:54:36
5 sometimes they would -- It was just sort of 10:54:39
6 a checklist for them to look at to -- 10:54:45
7 something they might not have thought 10:54:48
8 about. And it would just be a little 10:54:50
9 refresher list for them to look at. 10:54:55
10 Q. So these weren't requirements? 10:54:58
11 The farmers didn't have to do these? 10:55:00
12 A. Well, I didn't always receive 10:55:03
13 them back from the farms. They didn't -- 10:55:05
14 Not every farm signed them and dated them 10:55:10
15 and turned them in. 10:55:15
16 Q. There's a space down here for 10:55:23
17 flock advisor signature. Do you see that? 10:55:25
18 A. Yes. 10:55:28
19 Q. And this last item says: Air 10:55:28
20 speed checked. Air speed will be checked 10:55:33
21 by the flock advisor in full tunnel. 10:55:35
22 Do you see that? 10:55:38
23 A. Yes. 10:55:39
24 Q. So the flock advisor, you, would 10:55:39
25 check the air speed? 10:55:41

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 66

1 A. Yes. 10:55:43

2 Q. So you didn't always receive 10:55:43
3 these forms back, but there's a space for 10:55:47
4 your signature? 10:55:50

5 A. Yes. 10:55:51

6 Q. So when would you -- 10:55:53

7 A. That was -- 10:55:58

8 Q. I'm sorry. Go ahead. 10:55:59

9 A. That would be -- The one thing 10:56:00
10 that I would check would be the air speed. 10:56:02
11 And depending on which tier they were, you 10:56:06
12 know, like it says tier four, they had to 10:56:09
13 have seven hundred feet a minute. So I 10:56:15
14 would check the wind speed. 10:56:19

15 We -- That form is an old form; 10:56:20
16 we don't use that one anymore. I'm not 10:56:23
17 sure what date that would have been from. 10:56:25

18 Q. You said you're not sure what 10:56:27
19 date this is from? 10:56:29

20 A. I'm not sure what year that was 10:56:30
21 from. I mean, we change forms or -- We 10:56:32
22 don't currently use this form at all, but 10:56:36
23 I'm not sure what year that form is from. 10:56:39

24 A lot of times it will have a 10:56:41
25 date at the bottom, a revision date. 10:56:43

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 67

1 Q. You don't recall about what time 10:56:48
2 period you used this form? 10:56:51

3 A. I don't know. It would have been 10:56:52
4 maybe eight, ten years ago. 10:56:54

5 Q. So -- 10:56:56

6 A. We just have -- We just have a 10:56:59
7 checklist now that just has a box where you 10:57:01
8 just check the box off. We don't have a 10:57:04
9 date for each item or a signature for each 10:57:07
10 item. 10:57:11

11 Q. Okay. I'm going to turn to some 10:57:26
12 questions now about your work with Dale 10:57:31
13 Parker and Hazel Lee specifically. 10:57:33

14 When did you first begin working 10:57:38
15 with Dale Parker? 10:57:40

16 A. I think about 2017. I'm not sure 10:57:41
17 the exact month. 10:57:46

18 Q. And what about the Hazel Lee 10:57:48
19 farm, the same time frame? 10:57:58

20 A. I think about the same time. 10:58:01

21 Q. When you first started working 10:58:02
22 with Hazel Lee, did it generally receive 10:58:03
23 positive feedback? 10:58:06

24 A. Yeah. They were -- When you mean 10:58:07
25 they, you mean the farmer or just -- 10:58:13

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 68

1 feedback from who? What do you mean by 10:58:15

2 that? 10:58:17

3 Q. I'm thinking about their 10:58:18

4 compliance with Perdue's rules. 10:58:19

5 MS. WOOTEN: Objection to form. 10:58:22

6 You can answer. 10:58:23

7 A. Yeah. They were -- They were 10:58:24

8 growing chickens; they were an average, you 10:58:28

9 know, average farm type of 10:58:31

10 performance-wise. They were not -- They 10:58:37

11 were not in the top ten, they were not in 10:58:38

12 our top producers. So . . . 10:58:41

13 Q. But they weren't below average? 10:58:44

14 A. They might have been. I don't -- 10:58:46

15 I don't remember what his six-flock average 10:58:48

16 was. 10:58:50

17 Q. How did you interact with Mr. 10:58:51

18 Parker? Did you text him, call him, email 10:58:55

19 him? 10:58:59

20 A. Just call and text. 10:58:59

21 Q. How frequently did you 10:59:03

22 communicate with him? 10:59:06

23 A. Probably talked to him on the 10:59:07

24 phone or in person probably weekly. 10:59:11

25 Q. And he was your primary point of 10:59:18

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 69

1 contact on the farm? 10:59:25

2 A. Yes. 10:59:26

3 Q. And you testified earlier that 10:59:27

4 you prepared documentation when you visited 10:59:32

5 farms; right? 10:59:34

6 A. Yes. 10:59:35

7 Q. I want to review some of that 10:59:37

8 documentation that specifically concerns 10:59:42

9 Hazel Lee, if you'll give me one moment. 10:59:45

10 (Plaintiff's Exhibit 10:59:45

11 40 was marked for 10:59:45

12 identification.) 11:00:12

13 Q. Okay. Mr. Norris, can you see my 11:00:12

14 screen? 11:00:16

15 A. Yes. 11:00:17

16 Q. This is Plaintiff's Exhibit 40. 11:00:17

17 And this document is Bates number Perdue 11:00:19

18 006273. 11:00:23

19 Mr. Norris, have you seen this 11:00:29

20 document before? 11:00:31

21 A. Yes. 11:00:31

22 Q. What is this? 11:00:32

23 A. This is a -- It's a placement 11:00:46

24 sheet that we fill out when birds are 11:00:49

25 placed at the beginning of the flock. 11:00:52

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 70

1	Q.	It's dated August 10, 2017?	11:00:53
2	A.	I see that, yes.	11:00:56
3	Q.	And your name is by flock	11:00:57
4		advisor?	11:01:00
5	A.	Yes.	11:01:00
6	Q.	And by farm name, it says: Hazel	11:01:01
7		Lee flock 47?	11:01:09
8	A.	Yes.	11:01:10
9	Q.	So this document is for flock 47?	11:01:10
10	A.	Right. That's flock 47 for Hazel	11:01:13
11		Lee.	11:01:15
12	Q.	And right here (indicating)	11:01:15
13		there's a field for producer present, and	11:01:19
14		yes is circled; right?	11:01:22
15	A.	Yeah. Either -- Yes.	11:01:24
16	Q.	Are you able to complete this	11:01:27
17		form when the producer is absent?	11:01:29
18	A.	Yes.	11:01:32
19	Q.	So you can access the farm if the	11:01:33
20		producer isn't there?	11:01:38
21	A.	Yes. As long as -- The producer	11:01:44
22		doesn't have to be there. I think any	11:01:46
23		Perdue person could go to the farm.	11:01:48
24	Q.	So any Perdue representative has	11:01:50
25		access to the farm?	11:01:53

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 71

1 A. Right. 11:01:54

2 Q. This form has different sections 11:01:55

3 labeled post movement requirements, 11:02:03

4 preplacement, perfect placement, 11:02:05

5 postplacement, and welfare. What do these 11:02:09

6 terms mean? 11:02:12

7 A. Post movement is what is really 11:02:13

8 concerns to the previous flock, which would 11:02:19

9 have been flock 46, things that are done 11:02:22

10 after that flock moves. It says within 11:02:25

11 seventy-two hours, so that's what the post 11:02:33

12 movement is. 11:02:36

13 Then you have preplacement, which 11:02:37

14 is done even before birds are placed; 11:02:39

15 obviously, the placement is on the 11:02:42

16 placement -- the placement day. 11:02:43

17 Q. So perfect placement refers to 11:02:46

18 the placement day? 11:02:51

19 A. Yeah. That's a placement. 11:02:52

20 Placement day or sometimes days. It could 11:02:56

21 be two days, two different days. 11:02:59

22 Q. What do you do with this form 11:03:02

23 when it's completed? 11:03:04

24 A. I print off a copy and leave it 11:03:06

25 on the farm, and then I turn in a copy -- 11:03:10

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 72

1 or save a copy for Perdue, which is why you 11:03:14
2 have it there. 11:03:20

3 Q. I have some questions about the 11:03:20
4 specific items on this form. 11:03:24

5 Under post movement requirements, 11:03:26
6 you have this first one that says 11:03:29
7 cakeout/windrow, seventy-two hours. What 11:03:33
8 does that mean? 11:03:36

9 A. It means within seventy-two hours 11:03:40
10 or a couple days after a flock moves, the 11:03:43
11 farm needs -- the houses need to be caked 11:03:45
12 out, remove any wet cake in the chicken 11:03:48
13 houses. That's the best practice to do 11:03:51
14 that, is to do that as soon as possible 11:03:53
15 after the birds leave. 11:03:55

16 You don't want to wait three days 11:03:56
17 -- You don't want to wait seventy-two hours 11:03:58
18 before the birds are placed back. They 11:04:01
19 have a downtime in between flocks, and that 11:04:04
20 is done in between flocks. 11:04:06

21 Q. And what is cake? 11:04:09

22 A. It's litter in the chicken house, 11:04:11
23 it's wet or caked up because it's wet, and 11:04:16
24 that wet cake needs to be removed. 11:04:19

25 Q. And underneath that item -- I'm 11:04:21

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 73

1 sorry. Underneath that item it says: 11:04:25
2 Verify complete and evaluate quality. How 11:04:27
3 would you evaluate the quality of this 11:04:32
4 task? 11:04:33

5 A. Well, if -- if you go out to the 11:04:34
6 farm -- And you can go -- I could go there 11:04:36
7 any time in between flocks. So even though 11:04:41
8 that says 8/10/17, you can't really check 11:04:43
9 all that stuff on that day, everything in 11:04:49
10 one day, because some of that's done 11:04:51
11 earlier. 11:04:54

12 So you can -- You might be out 11:04:57
13 there a week before they place back. And 11:04:59
14 sometimes the downtime could be -- in 11:05:01
15 between flocks could be fourteen days, 11:05:04
16 twenty-one days, or twenty-eight days. 11:05:07
17 Currently it's twenty-four. 11:05:10

18 But in between flocks, you could 11:05:12
19 -- I could go out there three days before 11:05:16
20 he places birds, and he's -- if the farm is 11:05:19
21 caking out then, well I know he didn't do 11:05:23
22 it seventy-two hours after the birds moved, 11:05:26
23 after post placement. 11:05:29

24 Q. And ventilated between flocks, 11:05:31
25 what does that refer to? 11:05:34

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 74

1 A. That refers to -- Some of the 11:05:35
2 farms -- Again, that's one of those best 11:05:37
3 practices that if you close up the house -- 11:05:40
4 If you remove the cake as soon as possible 11:05:43
5 after the chickens move, you're going -- 11:05:46
6 your litter is going to have time to dry 11:05:48
7 and recover. 11:05:51

8 And if you close up the house and 11:05:53
9 run a fan in between flocks, on a timer, it 11:05:55
10 may run a minute out of every ten minutes. 11:06:00
11 It will help keep the house drier and get 11:06:02
12 it prepared for the next flock. 11:06:09

13 Q. And is this something that the 11:06:11
14 farmers have to do? 11:06:14

15 A. Not all farms do that. Some 11:06:15
16 farms do, some farms don't. If I had a 11:06:18
17 farm, I would do it. It gets you ready for 11:06:24
18 the next flock, it gets the litter ready. 11:06:28

19 Q. What about flushing the water 11:06:32
20 lines with peroxide? 11:06:34

21 A. It says yes on there, so 11:06:39
22 apparently at that time he must have 11:06:41
23 flushed with peroxide. Which I do bring 11:06:43
24 peroxide to the farms; it's provided to the 11:06:46
25 farms, there's no charge for that. They 11:06:48

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 75

1 bring it to the farms, and the farmer will 11:06:54
2 flush the drinker lines. It's a way to 11:06:57
3 sanitize the drinker lines in between the 11:07:00
4 flocks, because you can't do it when the 11:07:02
5 birds are in the house. But that's -- 11:07:03

6 That's a process to clean the water lines. 11:07:13

7 Q. Is that for animal welfare? 11:07:16

8 A. Yes. It's to keep the water line 11:07:18
9 -- just to sanitize the water lines. Part 11:07:21
10 of water sanitation. 11:07:23

11 Q. And you -- 11:07:25

12 A. Sometimes we put -- You've got a 11:07:26
13 yes or a no there, because you can put no 11:07:28
14 in there because sometimes we use it every 11:07:30
15 other flock. So in this case, that flock, 11:07:33
16 he must have did it -- I notice that's 11:07:36
17 flock 47. The way I remember it is, I try 11:07:39
18 to get farmers to do that particular thing 11:07:44
19 every other flock. So it's an odd number 11:07:47
20 like 47, yes. And 48, you know, you don't 11:07:49
21 have to do it. 49. So you can do it every 11:07:52
22 other flock. But on that time he used a 11:07:56
23 peroxide. 11:07:59

24 Q. I'll zoom in a little. Under 11:07:59
25 perfect placement, you have a category for 11:08:06

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 76

1 air. And one of the items is minimum 11:08:09
2 static pressure requirements met. What are 11:08:11
3 the minimum static pressure requirements? 11:08:14

4 A. That's -- That's part of the tier 11:08:17
5 pay. So the static pressure is a way to 11:08:25
6 measure how tight the house is or -- That's 11:08:28
7 not just insulation, but it's a way to 11:08:33
8 measure the tightness of the house. 11:08:38

9 Q. And what about supplemental feed 11:08:40
10 standards? 11:08:43

11 A. They have -- That's a extra -- We 11:08:44
12 have feed lines in the chicken houses. 11:08:50
13 Those four things right there, feed, water, 11:08:53
14 light, and air, that's the only thing you 11:08:56
15 can do to help control the environment in 11:09:00
16 the chicken house. You know, if you're a 11:09:01
17 flock advisor, you'd sort of preach that. 11:09:10
18 But feed, water, light, and air, that's all 11:09:10
19 we can control in that environment. And 11:09:15
20 the feed -- Obviously, Perdue brings all 11:09:17
21 the feed to the farm. But the farmer puts 11:09:17
22 out -- at placement, they put out 11:09:20
23 additional feed pans. 11:09:22

24 Q. At the bottom here there's a 11:09:23
25 section for comments. 11:09:29

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 77

1 A. Uh-huh. 11:09:31

2 Q. And one of your comments is in 11:09:31

3 all caps, all capital letters, it says: 11:09:34

4 Need to cut grass again, and in normal 11:09:37

5 text: And keep it maintained for the PVP 11:09:42

6 bonus. 11:09:47

7 A. Right. 11:09:48

8 Q. Is it in all capital letters for 11:09:49

9 emphasis? 11:09:51

10 A. Yes. 11:09:52

11 Q. What is the importance of cutting 11:09:52

12 the grass? 11:09:54

13 A. It's a -- It's the biosecurity. 11:09:54

14 If you've got tall grass, then you're 11:09:58

15 inviting, you know, snakes and rodents. So 11:10:02

16 if you keep the grass maintained, you will 11:10:06

17 have less infestation with rats and snakes 11:10:08

18 and the like. 11:10:12

19 Q. And that was a prerequisite for 11:10:21

20 the PVP bonus? 11:10:23

21 A. It is. It's on that list. It's 11:10:25

22 better to cut the grass before the birds 11:10:27

23 place. You can cut birds -- You can cut 11:10:29

24 grass with chickens in the house, but the 11:10:35

25 older they get, it could disturb the birds 11:10:37

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 78

1 with lawn mowers and Weed Eaters and stuff 11:10:40

2 right outside that chicken house wall. 11:10:42

3 But, yeah, that -- When I put 11:10:44

4 "again" like that, that means that it is a 11:10:48

5 farm that probably did not cut the grass, 11:11:00

6 did not keep the grass maintained. 11:11:03

7 Q. Was keeping the grass maintained 11:11:05

8 to a certain level, something you expected 11:11:08

9 Hazel Lee and other farms to do? 11:11:10

10 A. Yes. All farms. It's part of 11:11:12

11 the biosecurity. 11:11:14

12 Q. So it's a requirement? 11:11:14

13 MS. WOOTEN: Object to form. 11:11:18

14 A. Well, if they didn't cut the 11:11:19

15 grass, then they would not receive the 11:11:22

16 extra pay, the PVP bonus would not be paid. 11:11:24

17 Q. Is that the only consequence of 11:11:33

18 not cutting the grass? 11:11:35

19 A. Other than -- I mean, as far as 11:11:38

20 Perdue, I mean, of course if he's going to 11:11:43

21 have snakes and rodents and rats, and then 11:11:46

22 the rats are going to chew up your wiring 11:11:51

23 and your insulation. I mean, I cut the 11:11:53

24 grass at my house, but my brother-in-law 11:11:55

25 doesn't cut his grass, though. 11:11:57

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 79

1	Yeah. It's not just	11:11:59
2	for aesthetics, to look good when you drive	11:12:06
3	pass the farm, it's really to keep rodent	11:12:09
4	population at bay.	11:12:12

5 Q. But in terms of Perdue, the only 11:12:13
6 consequence is not getting that bonus? 11:12:15

7	A. Right. They could -- They could	11:12:17
8	lose that bonus if they don't cut the	11:12:19
9	grass.	11:12:30

10	(Plaintiff's Exhibit	11:12:30
11	41 was marked for	11:12:30
12	identification.)	11:12:30

13	Q.	I'm still sharing my screen and I	11:12:30
14		am going to show you another document that	11:12:33
15		I'm marking at Plaintiff's <u>Exhibit 41</u> .	11:12:35
16		This document is Bates stamped Perdue	11:12:37
17		006227.	11:12:43

18	Mr. Norris, have you seen this	11:12:44
19	document before?	11:12:46

20	A. Yes, I think so.	11:12:46
----	---------------------	----------

21	Q. What is this document?	11:12:47
----	---------------------------	----------

22	A. Can we -- This is a different	11:13:01
23	one, this is Week 1 -- It's a Week 1	11:13:04
24	visitation for Hazel Lee.	11:13:04

25	Q.	Dated August 17, 2017?	11:13:06
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James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 80

1 A. Yes. That's what it looks like. 11:13:10

2 Q. If I scroll to the bottom, this 11:13:12

3 is your signature at the flock supervisor 11:13:14

4 signature? 11:13:20

5 A. Yes. 11:13:20

6 Q. And what does your signature at 11:13:20

7 the bottom indicate? 11:13:21

8 A. It's just -- It's really just so 11:13:22

9 they know which flock advisor filled it out 11:13:24

10 when I turn it in. They know if it was me 11:13:28

11 or another flock advisor. 11:13:30

12 Q. And what does week 1 mean? 11:13:33

13 A. Week 1 is generally any time 11:13:38

14 between -- Day of placement, it's what we 11:13:41

15 call day of placement. You've got -- The 11:13:45

16 next day is called day two. So any time 11:13:48

17 between day two and day seven is usually 11:13:51

18 when that is filled out. 11:13:54

19 Q. And do you complete these forms 11:13:55

20 for subsequent weeks? 11:13:58

21 A. Yes. We have some for week two, 11:13:59

22 week three, week four, on down the list. 11:14:04

23 Q. And are the forms different each 11:14:16

24 week? 11:14:18

25 A. Yes. There are different items 11:14:18

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 81

1 on there. There's some things that remain 11:14:19
2 the same each week, there's some things 11:14:21
3 that just condition week one, week two, 11:14:23
4 week three, all the way through the flock. 11:14:25
5 But there are some things that are 11:14:27
6 different -- different boxes on there. 11:14:29
7 Q. And this top row, which is 11:14:31
8 labeled biosecurity, this first item is -- 11:14:36
9 says: Mailbox, visitor log, trash can, 11:14:39
10 signage, mailbox number, and documents in 11:14:43
11 place. Correct? 11:14:45
12 A. Yes. 11:14:46
13 Q. And you've circled yes? 11:14:46
14 A. Yes. 11:14:49
15 Q. So in week one, you're checking 11:14:50
16 for all of those things? 11:14:52
17 A. Yeah. And most of those -- Most 11:14:53
18 of those, except for the trash -- I mean a 11:14:55
19 trash can, is stuff that a flock advisor is 11:14:58
20 -- I mean, the flock advisor is using the 11:15:02
21 visitor log. The farmer doesn't even fill 11:15:05
22 that out, the farmer doesn't even look at 11:15:08
23 that usually, unless they stop at the 11:15:11
24 mailbox, open it, and look at it. It's 11:15:12
25 mainly a Perdue log. 11:15:16

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 82

1 And then the documents in place 11:15:18
2 are the documents that are on the wall, the 11:15:21
3 temperature charts and the lighting. As 11:15:24
4 long as -- Those are supposed to be -- 11:15:29
5 That's really more of flock advisor items. 11:15:31

6 Q. What about the second item: Foot 11:15:38
7 pans at all access doors being used by 11:15:40
8 farmer and help. And you've circled yes 11:15:42
9 there. 11:15:44

10 A. Yes. We provide all the farms 11:15:45
11 with a foot pan that is at their access 11:15:48
12 door where their personnel goes in and out. 11:15:50
13 So we provide them with a foot pan, and we 11:15:53
14 provide them with the bleach, it's a 11:15:55
15 powdered bleach for all the pans. And we 11:15:58
16 don't -- We don't charge them for that pan 11:16:00
17 or for the bleach. If they need fresh 11:16:02
18 bleach, it's -- it's usually refreshed or 11:16:05
19 replaced at the beginning of every flock. 11:16:08

20 Q. And the farmer -- The farmers and 11:16:12
21 their help have to use those foot pans? 11:16:17

22 A. Yes. 11:16:20

23 Q. And that's for biosecurity? 11:16:21

24 A. For biosecurity. It's a door 11:16:23
25 that they normally are going in and out of, 11:16:26

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 83

1 they're going to step into that pan, as 11:16:28
2 well as a flock advisor, or anybody from 11:16:31
3 Perdue or someone working on equipment may 11:16:33
4 -- they're going to come in -- they're 11:16:35
5 going to step in that pan in order to 11:16:37
6 disinfect their shoes. 11:16:41

7 Q. This middle row here is labeled 11:16:46
8 production, and there are a couple of 11:16:48
9 different standards there in the middle. 11:16:54
10 There's one that says ventilation adequate, 11:16:57
11 feeder height adequate, water height 11:17:00
12 adequate, and so on. 11:17:07

13 Do you see those? 11:17:09

14 A. Yes. 11:17:10

15 Q. And you've circled yes for all of 11:17:10
16 these; right? 11:17:13

17 A. Yeah. It looks like they're all 11:17:14
18 yes. 11:17:16

19 Q. How do you determine whether to 11:17:16
20 mark that something is adequate? 11:17:18

21 A. Well, at that age, a young bird, 11:17:19
22 it doesn't take a lot of fan to be -- the 11:17:24
23 ventilation to be adequate. You see it 11:17:27
24 says -- it says sixty seconds right above 11:17:30
25 there, that's the run time. We have some 11:17:34

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 84

1 -- The Best Management Practices for 11:17:38
2 ventilation, as the birds get older, we 11:17:42
3 need more fans to keep the birds 11:17:44
4 comfortable. But at that age, sixty 11:17:46
5 seconds is adequate, so -- and that's with 11:17:55
6 using two fans. 11:17:57

7 Now, the older the birds get, 11:17:59
8 you're going to need more fans; you're 11:18:02
9 going to need two fans, three fans, up to 11:18:03
10 ten, twelve fans, depending what type of 11:18:06
11 house you have. 11:18:09

12 Q. So in this case, Hazel Lee needed 11:18:09
13 to run its fans for at least sixty seconds? 11:18:11

14 A. Yeah. That was enough, yes. You 11:18:15
15 can run more. You can run more air or you 11:18:17
16 could can run a little less if it's cold 11:18:25
17 outside you run -- you may cut it back 10 11:18:28
18 percent. So that was right about where it 11:18:30
19 needs to be at week one. I think that says 11:18:32
20 day seven. 11:18:35

21 Week one could be day two, it 11:18:37
22 could be -- at day two you might only be 11:18:40
23 running thirty seconds. But by day seven 11:18:42
24 you're probably up to sixty seconds. 11:18:44

25 Q. And were these run times 11:18:49

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 85

1 communicated to the farmers in some kind of 11:18:51
2 document? 11:18:53

3 A. Yeah. That's -- It's actually in 11:18:53
4 the controller, the little computer that 11:18:55
5 runs your temperatures and lights. You 11:18:57
6 pretty much set it up, everything is in 11:19:00
7 there, and it runs -- it runs itself. 11:19:02

8 Sort of like that Ronco 11:19:06
9 rotisserie oven, you can't just set it and 11:19:08
10 forget it. You've got to monitor it and 11:19:12
11 look at it and make sure -- Like, if you've 11:19:14
12 got two fans that are supposed to be 11:19:15
13 running, you need to make sure those fans 11:19:17
14 are operational in the back of the house, 11:19:19
15 that they actually function, that the belt 11:19:21
16 didn't come off, or the motor burn out. 11:19:23

17 But there are posted temperature 11:19:25
18 guides at each house, on each farm -- every 11:19:31
19 house -- every farm, every house has those 11:19:35
20 temperature and ventilation numbers. 11:19:39

21 Q. Including Hazel Lee? 11:19:43

22 A. Yes. 11:19:45

23 Q. What about feeder height, how do 11:19:45
24 you determine that the feeder height is 11:19:51
25 adequate? 11:19:52

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 86

1 A. I -- Well, there's -- It's just a 11:19:53
2 -- They can either be too high or too low, 11:19:56
3 is a short way to put it there. If they're 11:20:00
4 too high, the birds cannot reach the feed. 11:20:02
5 The birds just need to be able to reach the 11:20:06
6 feed at any time, they have access to feed. 11:20:08
7 It's just visually looking at it, 11:20:16
8 and looking at the size or the age of the 11:20:19
9 birds. Because obviously, the older the 11:20:21
10 bird, then the higher -- the bigger the 11:20:23
11 bird and the higher the height has to be. 11:20:25
12 Q. So just -- You just look at -- 11:20:26
13 You just take a -- You just visually look? 11:20:34
14 A. Right. You look in the house and 11:20:37
15 you look at the feed line. 11:20:39
16 Q. What are the purpose of these 11:20:41
17 standards under production? 11:20:50
18 A. It's for the -- 11:20:52
19 MS. WOOTEN: Object to form. 11:20:55
20 A. It's for bird health, bird 11:20:56
21 growth. If there's no feed, the bird is 11:20:59
22 not going to eat; if they don't eat, 11:21:04
23 they're not going to gain weight. 11:21:06
24 So it all goes with -- I mean it 11:21:08
25 says production, that's really a part of 11:21:10

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 87

1 the welfare, because you've got to have 11:21:13

2 access to feed and water twenty-four/seven. 11:21:15

3 Q. So these are related to animal 11:21:18

4 welfare? 11:21:23

5 A. Yes. 11:21:23

6 Q. And this last row is labeled 11:21:23

7 welfare; right? 11:21:31

8 A. Yeah. That one is a little more 11:21:31

9 specific because it's -- It's not in the 11:21:33

10 controller, it's not in the -- It's not a 11:21:35

11 setting for, like, an alarm setting. 11:21:37

12 Q. And this second item says: 11:21:40

13 Mortality and culling recorded separately. 11:21:45

14 What does that refer to? 11:21:50

15 A. As part of the producer contract, 11:21:50

16 they have to check on the birds at least 11:21:55

17 twice a day. We have a -- what we call a 11:21:59

18 mortality sheet, and they record the 11:22:01

19 numbers daily. If they pick up one bird or 11:22:04

20 two birds or eight birds, whatever the 11:22:08

21 number is, it has to be recorded. 11:22:10

22 And it looks like -- I don't know 11:22:13

23 what day the 18th was on, that might have 11:22:15

24 been a Monday. I don't know, I'd have to 11:22:18

25 go back and look. But it says no mortality 11:22:21

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 88

1 written down between day four and day seven 11:22:24
2 at house one to three. So they weren't 11:22:28
3 writing down the numbers daily, which makes 11:22:33
4 me question were they in the house, did 11:22:35
5 they pick up the dead birds? I don't know. 11:22:37

6 Q. So when you refer to numbers, 11:22:40
7 you're talking about dead birds? 11:22:42

8 A. Yeah. Dead birds or birds that 11:22:44
9 were -- it says mortality and culling, so 11:22:46
10 it's both. 11:22:48

11 Q. What does culling refer to? 11:22:48

12 A. Culling is -- Well, it's just 11:22:50
13 where we have to cull out a bird that's 11:22:54
14 either unhealthy or it's just a bird that's 11:22:57
15 unlikely to thrive or to survive; if it's a 11:23:00
16 bird with an injury or a problem with the 11:23:03
17 bird, they need to be culled out. 11:23:06

18 Q. And you mentioned that recording 11:23:09
19 mortality and culling was part of the 11:23:13
20 contract? 11:23:14

21 A. Yeah. They have to -- they have 11:23:16
22 to pick up birds -- or they have to go into 11:23:18
23 the house twice a day to monitor -- to look 11:23:23
24 at the birds. Somebody has got to be 11:23:29
25 there. 11:23:31

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 89

1 Q. And that is written into the 11:23:32
2 poultry producer agreement? 11:23:34

3 MS. WOOTEN: Object to form. 11:23:35

4 A. I'm pretty sure it is. I don't 11:23:36
5 have a copy of it, but that's just -- 11:23:40
6 that's just animal husbandry is taking care 11:23:43
7 of the animals when they're on the farm. 11:23:51

8 Q. So recording mortality and 11:23:54
9 culling, that's a requirement? 11:23:59

10 A. Yes. And it could be a zero. 11:24:00
11 The number could actually be a zero. It 11:24:02
12 could be zero dead being mortality, it 11:24:04
13 could be zero culls. But sometimes there 11:24:07
14 are zero days where you don't pick up any 11:24:11
15 dead chickens. But there were no zeros 11:24:15
16 wrote in there, it was just empty. So it 11:24:24
17 says no mortality. 11:24:25

18 Q. So what's the consequence -- I'm 11:24:26
19 sorry. Let me rephrase. 11:24:29

20 As you said, you wrote here no 11:24:30
21 mortality written down day four through 11:24:33
22 seven at house 1 through 3; correct? 11:24:37

23 A. Yes. 11:24:41

24 Q. What consequences would Mr. 11:24:41
25 Parker face for not writing down the 11:24:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 90

1 mortality? 11:24:45

2 A. I don't really know. It's got -- 11:24:46

3 It says -- That's why I've got question 11:24:48

4 marks below that. It says flocks inspected 11:24:51

5 twice daily. That makes me wonder, if you 11:24:54

6 didn't write any numbers down, did you go 11:24:57

7 into the house, are you looking after the 11:24:59

8 birds? What happened? Did you just forget 11:25:01

9 to write them down? I don't know. 11:25:03

10 Sometimes people go: I forgot to write 11:25:05

11 down yesterday's number. 11:25:07

12 Or you may have a couple, like a 11:25:08

13 husband and a wife, and one of them was 11:25:10

14 picking up house one to thee, and the other 11:25:12

15 spouse is picking them up four through six. 11:25:16

16 So maybe one of them wrote them -- is good 11:25:18

17 about writing down the numbers and the 11:25:21

18 other one forgets. 11:25:22

19 Q. But to go back to my question, 11:25:24

20 what kind of consequence would Mr. Parker 11:25:27

21 face for not writing down the mortality? 11:25:30

22 A. Well, there's not really a 11:25:33

23 consequence, other than it -- it needs to 11:25:38

24 be -- it needs to be done daily. It's not 11:25:41

25 good for the farm because you can't ensure 11:25:45

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 91

1 that it was done. It's just -- It's a 11:25:48
2 minimum requirement to ask that you go and 11:25:51
3 look at the birds and to record the 11:25:53
4 numbers. 11:25:59

5 And I know people forget 11:25:59
6 sometimes, but if it's -- if it's four 11:26:01
7 days, three or four days, you get in the 11:26:06
8 habit of doing that. 11:26:13

9 Q. So there weren't any consequences 11:26:14
10 for not doing this? 11:26:16

11 A. No. Just other than me noting it 11:26:18
12 and saying, hey, you need to write these 11:26:22
13 down every day. Really, you're surprised 11:26:23
14 -- It's usually somebody just forgets. But 11:26:25
15 it shouldn't be an ongoing thing. You 11:26:29
16 can't build the whole flock without writing 11:26:32
17 down the numbers. And you can't just leave 11:26:35
18 the farm and not look at the birds. 11:26:36

19 So it's a small indication that 11:26:39
20 makes you wonder what's going on, you know, 11:26:41
21 why aren't you writing down these numbers. 11:26:43

22 Q. At the bottom of this document, 11:26:45
23 there's a section for special 11:26:48
24 notes/message. And you've written a few 11:26:53
25 things, and some of these are in capital 11:26:55

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 92

1 letters: Still need to get grass cut and 11:26:58
2 keep maintained. Need to follow new temp 11:27:01
3 guidelines. Need to update generator log 11:27:04
4 today. 11:27:08

5 Do you see those? 11:27:09

6 A. Right. Yeah. All those things 11:27:09
7 are on that PVP bonus. So in order to get 11:27:11
8 the PVP bonus, the grass -- it looks like 11:27:15
9 that placement, the grass had not been cut 11:27:17
10 before the birds placed. And at this 11:27:19
11 point, day seven, the grass had not been 11:27:21
12 cut. And the generator log is on that PVP 11:27:25
13 bonus also. It needs to be -- Once a week, 11:27:34
14 it exercises, you run the generator once a 11:27:37
15 week, and you just log -- you just write 11:27:39
16 down the hours that it ran. And that 11:27:42
17 hadn't been done. 11:27:44

18 And the need to follow 11:27:47
19 temperature guidelines, if that was a 11:27:50
20 posted temperature guide, we probably had a 11:27:53
21 summer guideline at that point, because 11:27:56
22 that looks like it was August -- I mean, is 11:27:57
23 it July. So we have a winter guideline for 11:28:01
24 cooler weather. 11:28:04

25 So when we have a new temperature 11:28:10

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 93

1 guideline, that's a new -- for the new 11:28:13

2 weather, new season. 11:28:14

3 Q. You had mentioned earlier that 11:28:15

4 temperature guidelines were part of animal 11:28:18

5 welfare? 11:28:21

6 A. Yes. 11:28:21

7 Q. They're also part of getting the 11:28:22

8 PVP bonus? 11:28:28

9 A. The temperature guide is probably 11:28:36

10 not on the PVP bonus. So if they ran a 11:28:37

11 different temperature, warmer or cooler, 11:28:40

12 it's not ideal for the birds -- for the 11:28:42

13 welfare or the production of birds, but you 11:28:44

14 still would get the -- that's not on the 11:28:46

15 PVP bonus. 11:28:49

16 Q. So the temperature guidelines are 11:28:49

17 requirements? 11:28:51

18 MS. WOOTEN: Object to form. 11:28:53

19 A. It's a -- It's just a -- It's the 11:28:53

20 best temperature for the bird. It's the 11:28:59

21 best practice to run at that -- at that age 11:29:02

22 or that time of the year. We have some 11:29:05

23 winter temperatures and we have a summer 11:29:09

24 temperature. 11:29:11

25 Q. And the farmer doesn't have 11:29:12

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 94

1 discretion to vary from those? 11:29:14

2 A. Well, if you -- 11:29:16

3 MS. WOOTEN: Objection. 11:29:19

4 A. Do you have a copy of the 11:29:20

5 temperature guide? I don't know. You have 11:29:23

6 some documents there, but do you have a 11:29:28

7 copy of the temperature guide? 11:29:30

8 It has a place on there that says 11:29:32

9 that you can increase or decrease it based 11:29:35

10 on bird comfort. 11:29:38

11 So sometimes the birds may be too 11:29:39

12 hot, and you may -- you may change the 11:29:41

13 temperature; or they may be too cool, you 11:29:43

14 may change it. So there's some leeway in 11:29:46

15 there on that temperature guide. 11:29:48

16 Q. So there's a certain required 11:29:51

17 range? 11:29:54

18 MS. WOOTEN: Object to form. You 11:29:56

19 can answer. 11:29:57

20 A. Well, if you stick close to that 11:29:57

21 temperature chart, that bird is going to be 11:30:01

22 the most comfortable and you're going to 11:30:04

23 get the best performance out of that -- out 11:30:06

24 of that flock, based on other farms and 11:30:08

25 historical -- you know, historical, I guess 11:30:11

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 95

1 you'd say evidence, but historical farm 11:30:16
2 performance. 11:30:21

3 Q. If you found that a farmer was 11:30:24
4 five degrees outside that range, would you 11:30:28
5 recommend that he change? 11:30:30

6 A. Five is probably about where, you 11:30:33
7 know, that it might be okay. Depending on 11:30:37
8 -- Sometimes the weather outside could be 11:30:42
9 extreme, and the farmer may say: Hey, they 11:30:45
10 were too hot, I lowered it. I changed my 11:30:48
11 setting by five degrees to try to cool them 11:30:51
12 down. Five degrees is probably okay, 11:30:54
13 depending on -- depending on what you're 11:30:56
14 changing it for. 11:30:59

15 I mean, if you're just changing 11:31:00
16 it to try to save some propane, to try to 11:31:02
17 save some gas, then, no. If it's twenty 11:31:06
18 degrees outside, and you're -- you change 11:31:08
19 your setting to save propane, then there's 11:31:11
20 different reasons why someone might change 11:31:16
21 their settings. 11:31:19

22 Q. And, I'm sorry, I interrupted 11:31:20
23 you. 11:31:22

24 Let's say the farmer was ten 11:31:22
25 degrees off, he might be required to 11:31:27

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 96

1 change? 11:31:29

2 A. Yes. So do they know they're ten 11:31:30
3 degrees off? Sometimes I'm just checking 11:31:34
4 to make sure where we need to be. You 11:31:38
5 know, sometimes they could have -- it can 11:31:42
6 be a typo, someone could have put in eighty 11:31:47
7 degrees when they meant ninety degrees. 11:31:50

8 But ten degrees is pretty, pretty 11:31:53
9 wide. Ten degrees, the bird is not usually 11:31:56
10 comfortable with that. They're going to 11:32:00
11 either be too hot or too cold, depending on 11:32:01
12 which direction you're talking about. 11:32:04

13 Q. All right. Mr. Norris, are you 11:32:06
14 aware that Mr. Parker was placed on a 11:32:12
15 performance improvement plan during his 11:32:14
16 work for Perdue? 11:32:16

17 MS. WOOTEN: Object to form. 11:32:18

18 A. I -- Since he's no longer 11:32:19
19 growing, yes, he must have been at some 11:32:23
20 point. I'm not sure when that was, but, 11:32:27
21 yes, he would have been on the -- I didn't 11:32:30
22 see a copy of the letter. I didn't -- I 11:32:33
23 don't -- I don't know when, but I'm sure he 11:32:35
24 was. 11:32:37

25 Q. You said since he's no longer 11:32:37

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 97

1 growing -- 11:32:41

2 A. Yes. 11:32:42

3 Q. -- so are farmers always placed 11:32:42

4 on a performance improvement plan before 11:32:45

5 they stop growing for Perdue? 11:32:47

6 A. No. 11:32:48

7 MS. WOOTEN: Object to form. You 11:32:49

8 can answer. Mr. Norris, just a reminder to 11:32:50

9 allow Ms. Snow to finish her question 11:32:54

10 before you respond so we can get everything 11:32:58

11 clear on the Record. Sorry to interrupt. 11:32:59

12 A. Okay. No. 11:33:01

13 Q. So there's a reason beyond the 11:33:02

14 fact that Mr. Parker is no longer growing 11:33:06

15 for Perdue that makes you think he was 11:33:09

16 placed on a performance improvement plan? 11:33:11

17 MS. WOOTEN: Object to form, to 11:33:14

18 the extent it calls for speculation. You 11:33:17

19 can answer, Mr. Norris. 11:33:19

20 A. I don't know why he's not 11:33:20

21 growing. I think I had him like 2017, I 11:33:22

22 think he stopped growing in 2019. 11:33:25

23 Q. That's the extent of your 11:33:29

24 knowledge? 11:33:35

25 A. Yeah. I don't know the -- I 11:33:37

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 98

1 don't know how -- what the history is on 11:33:41
2 the farm, when he stopped growing. No, I 11:33:42
3 don't know -- Sometimes farms will -- 11:33:45
4 They'll sell a farm, they'll just decide to 11:33:48
5 stop growing chickens or -- so I don't know 11:33:51
6 why that farm is -- I didn't have him -- I 11:33:54
7 wasn't a flock advisor at that time, for 11:33:59
8 that farm at that time. 11:34:01

9 Q. Okay. I have some additional 11:34:04
10 questions about the documentation used on 11:34:06
11 Perdue farms. 11:34:08

12 Are you familiar with harvest 11:34:10
13 delivery tickets or live haul tickets? 11:34:13

14 A. Yes. 11:34:15

15 Q. Are those the correct terms or 11:34:16
16 would you use another word? 11:34:18

17 A. I think they're just referred to 11:34:21
18 as a live haul ticket. 11:34:25

19 Q. And what are live haul tickets? 11:34:27

20 A. It's a -- It's a ticket for -- 11:34:30
21 When they catch the chickens, they weigh 11:34:36
22 the truck at the scales in Perry, for the 11:34:40
23 plant. And they get a tare weight on the 11:34:46
24 -- they get a weight on the trailer. 11:34:48

25 So it's a trailer weight ticket 11:34:54

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 99

1 that's produced in order to send that farm 11:34:56

2 to that -- farm to catch. 11:35:01

3 Q. And you mentioned they weigh the 11:35:05

4 trailer. Do those trailers have a specific 11:35:06

5 number? 11:35:09

6 A. They do have trailer numbers. 11:35:10

7 But I don't work on the live haul side, 11:35:13

8 that's sort of a separate division or 11:35:16

9 separate part. 11:35:18

10 Q. And do the live haul tickets have 11:35:19

11 trailer numbers on them? 11:35:23

12 A. The ticket -- Again, I don't work 11:35:25

13 in live haul, but the driver would have the 11:35:32

14 -- I think the driver would have the ticket 11:35:36

15 with them when they arrive on the farm. 11:35:38

16 Q. But does the ticket itself have a 11:35:41

17 number that reflects the trailer that 11:35:43

18 carried the birds? 11:35:47

19 A. Yes. Yes. There's a ticket 11:35:49

20 number, yes. 11:35:51

21 Q. And so the trailer number on the 11:35:52

22 ticket should match the number on the 11:35:56

23 physical trailer? 11:35:58

24 A. I would assume. Again, I don't 11:35:59

25 work on the -- I've never printed a ticket 11:36:02

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 100

1 -- a live haul ticket. I don't work at the 11:36:05
2 scales. So I've kind of let them know -- 11:36:09
3 let the farmer know the catch schedule, and 11:36:13
4 the live haul would show up and catch them. 11:36:16

5 Q. And you talked about the driver 11:36:18
6 having the tickets, but who else receives 11:36:20
7 live haul tickets? 11:36:23

8 A. They leave one with the farm -- 11:36:25
9 at the farm. I think there are two copies 11:36:31
10 printed, and there's one that's left at the 11:36:34
11 farm. 11:36:38

12 Q. And Perdue receives a copy? 11:36:40

13 A. I think when they get back to the 11:36:43
14 plant, back to the processing plant, the 11:36:46
15 second copy is there, turned in. 11:36:50

16 Q. And do you know what purpose 11:36:55
17 these tickets serve? 11:36:57

18 A. Again, I don't work on live haul. 11:37:00
19 But it's to get a weight of the -- farm 11:37:04
20 weight of the chickens, so that you can 11:37:08
21 bring an empty trailer, load it with birds, 11:37:10
22 and then weigh the trailer and you know how 11:37:14
23 much weight to credit to that farm. 11:37:17

24 Q. And that weight is important 11:37:19
25 because, as you testified earlier, that's 11:37:21

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 101

1 how farmers are paid; right? 11:37:24

2 A. It's a farm weight, yeah. 11:37:26

3 Q. Were you aware that Mr. Parker 11:37:28

4 contacted USDA officials about an issue 11:37:34

5 with the trailer number on his live haul 11:37:37

6 tickets? 11:37:39

7 A. I don't know that he did. I 11:37:40

8 wasn't aware, no. 11:37:43

9 Q. And to back up, if I refer to 11:37:43

10 USDA, can we share the understanding that 11:37:50

11 I'm talking about the United States 11:37:53

12 Department of Agriculture? 11:37:54

13 A. Yeah. I'm -- Yeah, that's USDA. 11:37:56

14 Q. Are you aware that Mr. Parker 11:38:00

15 contacted the USDA for some other reason? 11:38:06

16 A. I don't know -- I don't know if 11:38:09

17 he contacted them or not. 11:38:13

18 Q. So you don't have any knowledge 11:38:16

19 of Mr. Parker speaking with the USDA? 11:38:18

20 A. I don't know if he did or not. I 11:38:21

21 don't know. 11:38:24

22 Q. So you never spoke to Mr. Parker 11:38:24

23 about his outreach to the USDA? 11:38:32

24 A. He -- I don't recall talking to 11:38:36

25 him about that. That's been years ago. 11:38:40

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 102

1 Q. And you never expressed to Mr. 11:38:46
2 Parker that he should not have reached out 11:38:49
3 to the USDA? 11:38:51

4 A. I don't -- I don't know if he did 11:38:52
5 or not. 11:38:55

6 Q. So if there were a recording of 11:38:56
7 you speaking with Mr. Parker in which you 11:39:04
8 indicated that he should not have reached 11:39:07
9 out to the USDA, would you dispute the 11:39:09
10 accuracy of that recording? 11:39:12

11 A. I don't -- I don't know. It -- I 11:39:14
12 don't know if -- I don't know if he did -- 11:39:22
13 I don't know if he did reach out to them. 11:39:29

14 Q. Well, Mr. Norris, that wasn't 11:39:30
15 precisely my question. If there were a 11:39:36
16 recording of you and Mr. Parker speaking, 11:39:38
17 and in that recording you indicated to Mr. 11:39:40
18 Parker that he should not have reached out 11:39:44
19 to the USDA, would you say that that 11:39:45
20 recording is not accurate? 11:39:48

21 A. It -- It could be. I have lots 11:39:50
22 of conversations with farmers. But none 11:39:55
23 that I -- I don't record any conversations, 11:39:57
24 so I don't -- I don't know what would have 11:40:00
25 been recorded. 11:40:02

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 103

1 Q. It could be accurate, you're 11:40:03
2 saying? 11:40:05

3 A. It may be. I don't know. 11:40:08

4 Q. Do you have any basis to dispute 11:40:09
5 that recording? 11:40:11

6 A. I don't -- I don't have any -- 11:40:13
7 No. 11:40:20

8 Q. So no basis to dispute it? 11:40:20

9 A. Other than, I don't -- I don't -- 11:40:23
10 I have -- I don't know that I was recorded 11:40:26
11 or that someone said I was recorded or told 11:40:28
12 me they were recording. I don't know of 11:40:32
13 any recordings. 11:40:35

14 Q. You just don't -- You don't have 11:40:36
15 knowledge of being recorded -- 11:40:39

16 A. No. 11:40:41

17 Q. -- but other than -- I'll finish 11:40:41
18 my question. 11:40:43

19 You don't have knowledge of being 11:40:44
20 recorded, but other than that, would you 11:40:46
21 dispute that that conversation occurred? 11:40:47

22 MS. WOOTEN: Objection to the 11:40:51
23 extent asked and answered already. You can 11:40:52
24 answer. 11:40:53

25 A. I don't -- I don't recall the 11:40:53

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 104

1 conversation. 11:40:57

2 Q. And so you don't recall telling 11:40:57

3 Mr. Parker that Perdue didn't want the USDA 11:41:03

4 to come audit them? 11:41:06

5 MS. WOOTEN: Objection to the 11:41:09

6 extent asked and answered. You can answer. 11:41:10

7 A. I don't recall him asking about, 11:41:12

8 you know, getting in touch with the USDA. 11:41:26

9 Q. Mr. Norris, were you aware that 11:41:30

10 Mr. Parker had to make repairs to his farm 11:41:35

11 prior to receiving a placement sometime in 11:41:38

12 fall 2018? 11:41:40

13 A. I know there was a lot of -- I 11:41:42

14 know there was a lot of equipment that was 11:41:50

15 not working properly on the farm, but I 11:41:52

16 don't know of what he had to repair. I 11:41:59

17 mean, we . . . 11:42:03

18 Q. How did you learn about the 11:42:09

19 equipment that wasn't working properly? 11:42:11

20 A. Well, most of the equipment I 11:42:16

21 know about is stuff that I see that needs 11:42:18

22 to be replaced or repaired. 11:42:20

23 Q. And so your knowledge of any 11:42:21

24 required repairs in the fall of 2018 was 11:42:27

25 related to equipment that needed to be 11:42:29

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 105

1 fixed? 11:42:31

2 A. Can you rephrase that? 11:42:32

3 Q. It was a confusing question. 11:42:37

4 You said you knew that some 11:42:40

5 equipment needed to be fixed on Hazel Lee; 11:42:44

6 right? 11:42:49

7 A. Right. There's things that 11:42:49

8 needed to be replaced or repaired. 11:42:51

9 Q. And that was around the fall of 11:42:54

10 2018? 11:42:56

11 A. I think that's the last time I 11:42:57

12 had the farm, was around that time, yes. 11:43:00

13 Q. You don't remember what equipment 11:43:02

14 or any other details? 11:43:05

15 A. It's probably the general things, 11:43:07

16 normal things: Fans, feed lines, water 11:43:12

17 lines. All things that pertain to the 11:43:15

18 chickens. 11:43:20

19 Q. When you say general things and 11:43:20

20 normal things, these were routine repairs? 11:43:28

21 A. They're what repairs? 11:43:31

22 Q. When you say general and normal 11:43:34

23 things, they were routine repairs? 11:43:36

24 A. Yes. Just keeping the equipment 11:43:39

25 operational. 11:43:44

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 106

1 Q. Did you have any communications 11:43:47
2 with Mr. Parker about those upgrades and 11:43:49
3 repairs? 11:43:52

4 A. Usually on service reports. And 11:43:53
5 it's usually just a repair, just fixing 11:43:59
6 something that doesn't -- that's not 11:44:01
7 working properly. I wouldn't call that an 11:44:03
8 upgrade. 11:44:05

9 Q. And sitting here today, you don't 11:44:06
10 recall any other details? 11:44:21

11 A. Other than just making -- your 11:44:24
12 normal things, making notations on service 11:44:28
13 reports for when I see things that are not 11:44:31
14 working, I may make a -- go by house by 11:44:33
15 house and say: House 1, you have a fan not 11:44:37
16 working; house 2, there's a fan not 11:44:40
17 working. But that's usually put on the 11:44:43
18 service reports. 11:44:47

19 Q. Service reports, you said? 11:44:48

20 A. Yes. The weekly visitation 11:44:49
21 reports. 11:44:52

22 Q. And you mentioned earlier that 11:44:53
23 you understand that Mr. Parker no longer 11:45:04
24 grows for Perdue? 11:45:06

25 A. Yeah. I don't think I -- I never 11:45:08

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 107

1 see his farm name on a placement schedule 11:45:10
2 anymore, so I'm not sure when he stopped 11:45:13
3 growing. 11:45:15

4 Q. And do you know why he stopped 11:45:16
5 growing for Perdue? 11:45:18

6 A. I don't know. 11:45:20

7 Q. Mr. Norris, aside from your 11:45:22
8 attorneys, have you discussed this lawsuit 11:45:32
9 with anyone? 11:45:34

10 A. No. 11:45:36

11 Q. What about emails or text 11:45:36
12 messages, have you exchanged emails or text 11:45:41
13 messages with anyone about this lawsuit, 11:45:44
14 again, aside from your attorneys? 11:45:45

15 A. No. 11:45:47

16 MS. SNOW: I'd like to take a 11:45:54
17 brief break, and then we can come back. 11:45:56
18 But, Ms. Wooten, I imagine I'm close to the 11:45:58
19 end of my questions. 11:46:01

20 VIDEOGRAPHER: The time is 11:46 11:46:04
21 a.m. We're off the Record. 11:46:06

22 (Recess taken.) 11:46:28

23 VIDEOGRAPHER: The time is 11:59 11:58:53
24 a.m. We're on the Record. 11:59:00

25 MS. SNOW: Mr. Norris, I don't 11:59:04

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 108

1 have any more questions for you, but thank 11:59:05

2 you very much for your time today. 11:59:07

3 THE WITNESS: Okay. 11:59:08

4 EXAMINATION 11:59:08

5 BY MS. WOOTEN: 11:59:13

6 Q. Mr. Norris, I have a few 11:59:13

7 follow-up questions for you. I may jump 11:59:16

8 around a little bit, so I apologize; that's 11:59:18

9 just kind of the nature of having to go 11:59:20

10 second and following up with just some 11:59:22

11 clarification questions. 11:59:25

12 Mr. Norris, do you recall when 11:59:26

13 Ms. Snow had asked you questions earlier on 11:59:27

14 about Perdue guidelines for growers and 11:59:30

15 referred to lighting guidelines, 11:59:32

16 temperature guidelines, and I believe 11:59:37

17 rodent bait guidelines? 11:59:38

18 A. Yes. 11:59:40

19 Q. Do you know -- And at one point I 11:59:41

20 believe they're referred to as policies. 11:59:44

21 Do you know if these are, quote, policies 11:59:45

22 or are these guidelines that Perdue 11:59:47

23 provides to growers? 11:59:50

24 A. They're -- Like the top of the 11:59:51

25 paper says on our temperature guidelines, 11:59:56

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 109

1 it says temperature guidelines. For summer 11:59:58
2 -- We have temperature guidelines for the 12:00:00
3 summer, and then we change them for the 12:00:02
4 winter. And we have lighting guidelines. 12:00:04

5 Q. Okay. And at one other point, I 12:00:11
6 believe you had talked about, you know, 12:00:15
7 having other ago culture on the farm. And 12:00:17
8 I'm not sure if this was clear or not so I 12:00:22
9 wanted to ask just a quick follow-up 12:00:24
10 question. Can farmers for Perdue have 12:00:27
11 other agriculture on the farm, for example, 12:00:29
12 cows, goats, things along those lines? 12:00:34

13 A. Yes. There -- They can have 12:00:36
14 cows, horses, goats, there are other 12:00:38
15 animals on the farm. Now, they don't need 12:00:41
16 to be in the house with the -- they 12:00:43
17 shouldn't be in the house with the 12:00:46
18 chickens. And people -- Obviously they can 12:00:48
19 have cats and dogs and of sort. 12:00:51

20 But they don't need to have other 12:00:53
21 fowl, other birds, other chickens or ducks, 12:00:55
22 like a little backyard flock or anything 12:00:58
23 like that at their home. You know, they 12:01:00
24 don't need to have a little backyard flock 12:01:02
25 where they're getting eggs from, because 12:01:05

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 110

1 that would be a biosecurity problem with 12:01:07

2 those birds being on the property. 12:01:09

3 Q. And, Mr. Norris, at some point 12:01:12

4 you stopped being a flock advisor for Hazel 12:01:16

5 Lee Farm; is that correct? 12:01:19

6 A. Yeah. Whenever we changed 12:01:20

7 routes. 12:01:22

8 Q. Okay. And do you have any 12:01:23

9 personal knowledge of what happened with 12:01:25

10 Hazel Lee Farm once you stopped being the 12:01:27

11 flock advisor? 12:01:29

12 A. I don't know, other -- I know 12:01:30

13 that we swapped routes, and then I've got 12:01:33

14 twelve more farms -- thirteen more farms to 12:01:36

15 look at. So you kind of -- That's kind of 12:01:38

16 in the rearview mirror; you kind of are 12:01:40

17 concentrating on the farms you currently 12:01:43

18 have. 12:01:46

19 So I think -- 12:01:46

20 Q. Go ahead. I'm sorry. 12:01:47

21 A. I think that was like 2017 I had 12:01:48

22 him, and then maybe 2018, the last time 12:01:51

23 that I had the farm was in 2018. 12:01:54

24 MS. WOOTEN: Thank you, Mr. 12:01:59

25 Norris. That's all the questions I have 12:02:00

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 111

1 for now. Ms. Snow may have follow-up 12:02:02

2 questions for you. 12:02:05

3 MS. SNOW: I don't have any 12:02:05

4 further questions for you, Mr. Norris. 12:02:07

5 VIDEOGRAPHER: This concludes 12:02:09

6 today's deposition. The time is 12:02 p.m. 12:02:10

7 and we're off the video record. 12:02:14

8 (The deposition was concluded at 12:02

9 p.m., April 8, 2025.)

10

11 (Signature not waived.)

12

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James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 112

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The following representations and Disclosures are made in compliance with Georgia Law, more specifically:

Article 10(B) of the Rules and Regulations of the Board of Court Reporting (Disclosure forms).

OCGA section 9-11-28(c) (disqualification of reporter for financial interest).

OCGA sections 15-14-37 (a) and (b) (Prohibitions against contracts except on case-by-case basis).

I am a certified court reporter in the State of Georgia.

I am a subcontractor for Veritext Legal Solutions. I have been assigned to make a complete and accurate record of these proceedings.

I have no relationship of interest in the matter on which I am about to report which would disqualify me from making a verbatim record or maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 113

1 I have no direct contract with any
2 party in this action and my compensation is
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17 colloquies, questions and answers as
18 submitted by the certified court reporter.

19 Exhibits: No changes will be made
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James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

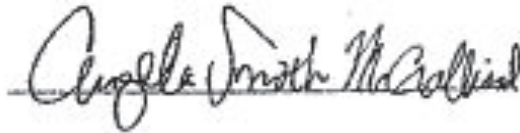
Page 114

1 ordering parties will have access.

2 REPORTER'S CERTIFICATE

3 I hereby certify that the above
4 and foregoing deposition was taken down
5 stenographically, and that the colloquies,
6 the questions and answers thereto were
7 transcribed by means of computer-aided
8 transcription; that the transcript is a
9 true and correct record of the evidence
10 given upon said proceeding. I have no
11 relationship of interest in this matter
12 which would disqualify me from maintaining
13 my obligation of impartiality in compliance
14 with the Code of Professional Ethics.

15 I have no direct contract with any
16 party in this action and my compensation is
17 based solely on the terms of my
18 subcontractor agreement. Nothing in the
19 arrangements made for this proceeding
20 impacts my absolute commitment to serve all
21 parties as an impartial officer of the court.

22 
23

ANGELA SMITH MCGALLIARD, RPR, CRR, CCR

24 Georgia Cert No.: 4599-7151-4544-9472

Expiration 4/1/2026

25 Notary Expiration 8/13/2027

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 115

1 VIRGINIA M. WOOTEN, ESQ.

2 virginia.wooten@ogletree.com

3 April 9, 2025

4 RE: Parker, Roger v. Perdue Foods, LLC

5 4/8/2025, James Norris (#7281766)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-southeast@veritext.com.

16 Return completed errata within 30 days from
17 receipt of testimony.

18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.

20
21
22 Yours,

23 Veritext Legal Solutions
24
25

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 116

1 Parker, Roger v. Perdue Foods, LLC

2 James Norris (#7281766)

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

5 _____

6 REASON_____

7 PAGE_____ LINE_____ CHANGE_____

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17 _____

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19 PAGE_____ LINE_____ CHANGE_____

20 _____

21 REASON_____

22 _____

23 _____

24 James Norris

Date

25

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

Page 117

Parker, Roger v. Perdue Foods, LLC

James Norris (#7281766)

ACKNOWLEDGEMENT OF DEPONENT

I, James Norris, do hereby declare that I
have read the foregoing transcript, I have made any
corrections, additions, or changes I deemed necessary as
noted above to be appended hereto, and that the same is
a true, correct and complete transcript of the testimony
given by me.

James Norris

Date

*If notary is required

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_____ DAY OF _____, 20____.

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James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[& - able]

Page 1

&	16 2:8 17:19	30303 3:21	6
& 3:17	17 2:16 79:25	30309 3:9	6 2:4
0	1825 3:13	36 2:8 16:18	63 2:16
001666 2:13	18307 114:23	17:1	69 2:19
57:6	18th 87:23	37 2:11 56:21	7
00268 1:5	19 2:8,14	57:4	7281766 115:5
004413 2:18	191 3:19	38 2:14 59:18	116:2 117:2
63:21	2	59:21 63:20	75 3:7
006227 2:25	2 106:16	39 2:16 63:16	79 2:23
79:17	20 30:4 117:15	63:24 64:3	7th 3:13
006228 2:15	20001 3:14	4	8
59:24	2006 12:20	4/1/2026	8 1:17 5:14
006273 2:22	2012 13:14	114:24	111:9
69:18	29:1 30:22,23	4/8/2025 115:5	8.b 4:2
006457 2:10	2017 67:16	40 2:19 69:11	8/10/17 73:8
17:3	70:1 79:25	69:16	8/10/2017 2:21
1	97:21 110:21	41 2:23 79:11	8/13/2027
1 2:9,24 24:10	2018 17:13,19	79:15	114:25
24:12 79:23,23	104:12,24	4599-7151-4...	821 3:13
80:12,13 89:22	105:10 110:22	114:24	9
106:15	110:23	46 71:9	9 115:3
10 70:1 84:17	2019 13:14	47 61:3 70:7,9	9-11-28 112:8
112:5	29:1 30:22	70:10 75:17,20	9:29 5:9,14
108 2:5	97:22	48 75:20	a
10:39 61:21	2020 10:14	4800 3:20	a.m. 5:9,14
10:51 61:24	2025 1:17 5:14	49 75:21	61:22,25
11:46 107:20	111:9 115:3	5	107:21,24
11:59 107:23	22 2:11	5 2:5	abbreviated
12 2:19,23	2700 3:8	56 2:11	58:18
13 2:4	3	59 2:14	able 25:22 41:8
15-14-37	3 89:22	5:22 1:5	70:16 86:5
112:11 113:10	30 115:16		

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[above - answering]

Page 2

above 5:10 31:13,20,20 44:3 83:24 114:3 115:6 117:7 absent 70:17 absolute 114:20 access 70:19,25 82:7,11 86:6 87:2 113:22 114:1 accompanying 6:2 accomplish 21:11 accuracy 102:10 115:9 accurate 102:20 103:1 112:18 accurately 9:1 achieve 56:4 acknowledge... 117:3 acknowledg... 115:12 acting 5:5 action 1:5 113:2 114:16 actually 85:3 85:15 89:11 add 42:2	added 17:5 adding 48:15 additional 30:19 43:4 47:25 48:10,13 48:14,18 49:17 54:23 59:12 60:10,19,21 76:23 98:9 additions 117:6 address 9:24,25 adequate 83:10 83:11,12,20,23 84:5 85:25 adhere 62:16 62:18,21 63:7 administer 58:12 59:3 administered 18:14 19:3,5 advisor 2:11 13:6,16 15:17 15:18 16:12 17:23 21:6 26:7 27:7 28:14 36:10 51:25 58:1,7 65:17,21,24 70:4 76:17 80:9,11 81:19 81:20 82:5 83:2 98:7 110:4,11	advisors 36:1 57:11,20,21 aesthetics 79:2 affects 22:17 affiliated 10:2 10:7 affirmative 32:9 age 83:21 84:4 86:8 93:21 ago 67:4 101:25 109:7 agree 42:4 agreed 42:3 agreement 42:12,16 89:2 113:4,9 114:18 agriculture 101:12 109:11 ahead 44:10 66:8 110:20 aided 114:7 air 48:7 52:19 53:9,10 65:19 65:20,25 66:10 76:1,14,18 84:15 alarm 87:11 alive 24:21 allotted 115:19 allow 33:6 97:9 allowed 50:3,4 allows 48:6	amount 41:23 42:3,5 43:14 45:5,10 angela 1:22 5:1 114:23 animal 26:11 36:15 39:18 40:2 54:19 55:18 56:10,14 56:16,18 75:7 87:3 89:6 93:4 animals 21:8,9 21:10 38:1 50:18 51:13 89:7 109:15 annual 54:21 answer 7:1,19 7:21 9:1 19:24 21:24 23:6 24:16 25:6 33:15 37:6 38:6,17 39:24 51:10,18,23 53:3 54:5,17 57:23 60:14 62:5 63:10 68:6 94:19 97:8,19 103:24 104:6 answered 33:10 103:23 104:6 answering 7:3
--	--	---	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[answers - biosecurity]

Page 3

answers 7:13 113:17 114:6 anybody 83:2 anymore 53:14 54:1,8 66:16 107:2 apologies 11:14 apologize 108:8 apparently 74:22 appended 117:7 applicable 25:4 115:8 applied 113:12 apply 49:14 april 1:17 5:14 17:19 111:9 115:3 area 31:6 50:9 50:11,15 56:9 57:12 areas 56:11 arrangements 114:19 arrive 26:23 35:16 99:15 article 4:2 112:5 aside 107:7,14 asked 7:18 103:23 104:6 108:13	asking 7:1 13:13 30:5 62:7 104:7 assigned 112:17 assume 8:1 99:24 assuming 46:20 atlanta 3:9,21 attached 115:11 attended 3:2 attorney 6:16 11:20 113:8 115:13 attorneys 107:8 107:14 113:21 audit 104:4 august 70:1 79:25 92:22 automatically 113:12 available 115:6 average 42:19 42:23,25 43:6 43:7,9,10,12,15 43:21,23 45:17 45:21 46:1,2 46:13 68:8,9 68:13,15 aware 15:4 19:15 96:14 101:3,8,14 104:9	b	bates 2:10,12 2:15,17,21,25 17:2,4 57:5 63:21 69:17 79:16 bay 79:4 beginning 5:9 20:4 69:25 82:19 begins 57:5 behalf 1:6,7 believe 57:16 63:3 108:16,20 109:6 belt 85:15 benefit 53:1,5 best 6:25 55:25 56:5,5,7 62:22 72:13 74:2 84:1 93:20,21 94:23 better 48:4 77:22 beyond 54:24 97:13 big 48:2 bigger 86:10 binder 23:24 biosecurities 15:5 biosecurity 14:15,19,23 15:3,9,11,19,22 18:3,8,14
		b 112:5,11 113:11 baby 26:23 back 14:18 20:11 32:2 45:16,20 54:11 65:1,13 66:3 72:18 73:13 84:17 85:14 87:25 90:19 100:13,14 101:9 107:17 background 12:18 14:22 backyard 109:22,24 bait 108:17 bank 45:11 barnesville 28:6 base 47:11,12 48:2,9,12 49:15 based 41:16 52:4 94:9,24 114:17 basic 6:22 basically 13:22 22:2 49:16 58:25 64:11 basis 31:18 103:4,8 112:13	

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[biosecurity - catch]

Page 4

19:13,16 20:19 20:23 21:1 22:7 34:15,18 34:22 36:14 37:12,24,25 39:21 46:9 50:21,23 54:18 55:18,24 56:10 56:12,16,18 62:2,3,8,10,14 62:25 77:13 78:11 81:8 82:23,24 110:1 bird 22:3,4,8,8 22:10,10,17 25:22 26:1 41:18,23 46:11 46:14 48:6 83:21 86:10,11 86:20,20,21 87:19 88:13,14 88:16,17 93:20 94:10,21 96:9 birds 13:25 14:1,3,7,7,25 15:6,7 19:14 19:16,20,21,22 20:2,4,18,22 21:1,10,15 22:7,7 24:20 26:23 36:25 37:23 39:15,17 40:11,16 41:17 42:4,10,11	43:13,14,18 45:25 46:23 49:21 50:17 51:8,11 52:6 56:8 62:24 69:24 71:14 72:15,18 73:20 73:22 75:5 77:22,23,25 84:2,3,7 86:4,5 86:9 87:16,20 87:20 88:5,7,8 88:8,22,24 90:8 91:3,18 92:10 93:12,13 94:11 99:18 100:21 109:21 110:2 bit 108:8 black 60:23,24 bleach 82:14,15 82:17,18 bmps 56:1,4,9 board 4:3 112:6 bonus 2:14 52:4,17 53:5 54:7 59:8,11 59:13,15 60:4 60:25 61:6 77:6,20 78:16 79:6,8 92:7,8 92:13 93:8,10 93:15	bonuses 52:1,3 52:9,11,13 54:1 book 23:22,23 24:1,7 bottom 17:8,21 57:15 58:5 66:25 76:24 80:2,7 91:22 box 67:7,8 boxes 81:6 brand 37:7 break 7:16,18 7:20 61:11,12 61:15,17,20 107:17 brief 61:17 107:17 briefly 16:20 bring 74:23 75:1 100:21 brings 76:20 brother 78:24 brought 25:23 build 91:16 built 48:23 53:21,22,23 burn 85:16	caked 72:11,23 cakeout 72:7 caking 73:21 calculated 52:3 calculating 41:22 calculation 41:24 call 27:4 28:16 29:7 44:12 68:18,20 80:15 87:17 106:7 called 10:18 18:2 62:10 80:16 calling 8:13 calls 31:16 97:18 capital 77:3,8 91:25 caplan 3:6 caps 77:3 car 64:13 care 21:8 58:16 89:6 carried 99:18 case 6:17 14:8 46:14 53:14 75:15 84:12 112:13,13 113:11 catch 13:23 26:16,20,25 27:1,2,4 29:9
		c	
		c 3:1,4 112:8 cake 72:12,21 72:24 74:4	

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[catch - communication]

Page 5

<p>98:21 99:2 100:3,4 category 75:25 cats 109:19 caught 25:23 cause 5:10 ccr 114:23 cert 114:24 certain 28:14 28:17 29:14 30:9 36:19 37:3,7 38:14 78:8 94:16 certainly 61:14 certificate 114:2 certified 1:23 5:2,3 112:14 113:18 certify 5:5 114:3 change 28:7 30:2,10,13,14 30:20 33:25 66:21 94:12,14 95:5,18,20 96:1 109:3 116:4,7,10,13 116:16,19 changed 27:7 27:10 28:1 33:21,23 53:13 95:10 110:6</p>	<p>changes 16:14 27:8,15 28:6 43:3 55:15 113:19 115:10 117:6 changing 27:16 95:14,15 charge 74:25 82:16 chart 23:10,12 94:21 charts 82:3 check 30:1 32:22 60:7 65:25 66:10,14 67:8 73:8 87:16 checked 65:20 65:20 checking 13:25 14:7 26:1 81:15 96:3 checklist 2:14 2:17 39:8 58:25 59:6 60:4 64:9,11 64:24 65:6 67:7 checklists 39:12 checks 44:12 chew 78:22 chicken 23:20 24:18 72:12,22</p>	<p>76:12,16 78:2 chickens 21:10 26:4 32:22,25 33:12 36:22 49:1 55:24 68:8 74:5 77:24 89:15 98:5,21 100:20 105:18 109:18 109:21 chore 55:9 circled 70:14 81:13 82:8 83:15 circumstances 46:8 civil 1:5 5:7 clarification 108:11 clarify 64:1 clarifying 19:2 class 55:1 clean 75:6 clear 11:16 33:8 97:11 109:8 close 8:20 74:3 74:8 94:20 107:18 closed 8:22 cobb 3:6 code 112:25 114:14</p>	<p>codes 28:19 cold 84:16 96:11 colloquies 113:17 114:5 combination 21:13 come 83:4 85:16 104:4 107:17 comfort 22:8 22:10,18 48:7 94:10 comfortable 24:21 37:1 39:15,17 84:4 94:22 96:10 comment 18:8 comments 18:7 76:25 77:2 commissioner 5:5 commitment 114:20 communicate 8:12 26:2 31:17 45:4 68:22 communicated 14:18,20 85:1 communicating 26:15,17 communication 31:14</p>
--	---	---	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[communications - culling]

Page 6

communicati... 11:11 106:1	69:8 71:8	control 24:9	correct 15:20
companies 49:21 51:4	concluded 111:8	37:10,12,20	33:25 36:16
company 22:2	concludes 111:5	38:24 39:1	40:14 81:11
50:1 51:1,12	condition 81:3	46:6 63:4	89:22 98:15
compensation 43:24 44:6,24	conference 1:18 5:8	76:15,19	110:5 113:16
45:22 48:5	confirm 8:7,9	controller 54:25 55:1,2	114:9 117:8
54:11 113:2	8:12 10:20	55:16 85:4	corrected 33:21
114:16	confusing 30:6	87:10	33:24
complete 34:3	105:3	controllers 27:13 55:10	corrections 117:6
64:20 70:16	consequence 78:17 79:6	convenient 61:13	council 4:4
73:2 80:19	89:18 90:20,23	conversation 103:21 104:1	counsel 5:17
112:18 113:16	consequences 40:20 89:24	conversations 11:10,19 16:4	11:4 33:6
117:8	91:9	102:22,23	115:14
completed 71:23 115:16	consistently 56:15	conversion 52:5	couple 72:10
complex 49:10	consists 30:9	cool 22:18	83:8 90:12
50:6,8	constantly 27:15	94:13 95:11	course 40:21
compliance 68:4 112:3,24	contact 69:1	cooler 92:24	56:13 78:20
114:13	contacted 101:4,15,17	93:11	court 1:1 4:3
comply 24:14	113:7	copeland 3:23	5:3 6:4,10 7:4
24:24 38:10	contents 57:19	6:3	7:12 11:7
computer 8:19	contract 51:6	copies 100:9	63:25 112:6,14
55:2 85:4	51:15 87:15	115:14	113:18 114:21
114:7	88:20 113:1	copy 34:4,6	cows 109:12,14
concentrating 110:17	114:15	35:18 71:24,25	created 34:11
concerned 19:18	contracts 51:20	72:1 89:5 94:4	credit 100:23
concerns 26:3	112:12	94:7 96:22	crr 114:23
29:8 50:21,24		100:12,15	cs 115:15
			cull 88:13
			culled 88:17
			culling 87:13
			88:9,11,12,19
			89:9

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[culls - discount]

Page 7

culls 89:13 culture 109:7 current 13:9 53:22 currently 13:10 28:24 66:22 73:17 110:17 cut 77:4,22,23 77:23 78:5,14 78:23,25 79:8 84:17 92:1,9 92:12 cutting 77:11 78:18 cv 1:5	117:12 dated 2:20 65:14 70:1 79:25 day 26:23 27:1 71:16,18,20 73:9,10 80:14 80:15,16,16,17 80:17 84:20,21 84:22,23 87:17 87:23 88:1,1 88:23 89:21 91:13 92:11 117:15 days 71:20,21 71:21 72:10,16 73:15,16,16,19 89:14 91:7,7 115:16 dc 3:14 dead 88:5,7,8 89:12,15 deakins 3:17 6:1 deal 22:1 deb 3:11 decide 98:4 decides 48:20 decision 30:12 declare 117:4 decline 49:2 decrease 94:9 dedicated 62:11 63:1	deemed 117:6 defendant 1:12 3:15 6:1 degree 26:10 26:11,11 degrees 95:4,11 95:12,18,25 96:3,7,7,8,9 delivery 98:13 department 101:12 depend 15:13 dependent 41:12 depending 39:15 66:11 84:10 95:7,13 95:13 96:11 depends 30:23 deponent 115:13 117:3 deposing 115:13 deposited 45:11 deposition 1:15 5:16 6:19 8:6 9:8 11:3 111:6 111:8 114:4 described 56:7 details 105:14 106:10 determination 30:11	determine 41:1 41:20 43:23 45:22 83:19 85:24 determined 41:2 113:3 determines 41:21 different 27:11 27:12,12,13,13 27:14,16,17,18 27:19,20,21,23 28:1,2,2,3,4,8,8 28:18 38:20 46:18 47:15,16 50:1 55:11,12 71:2,21 79:22 80:23,25 81:6 81:6 83:9 93:11 95:20 direct 31:10 113:1 114:15 direction 96:12 directly 31:4 disaster 45:24 46:5 disclose 11:10 disclosure 4:1 112:7 disclosures 112:1,3 113:5 discount 113:13
d			
d 2:1 daily 14:8 87:19 88:3 90:5,24 dale 5:21,23 6:17 18:16 19:4 67:12,15 damage 37:13 37:14,15 dan 30:24 31:20 dashboard 65:4 date 5:6,13 17:18 57:14,15 66:17,19,25,25 67:9 116:24			

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[discounts - exception]

Page 8

discounts 113:11 discretion 94:1 discussed 107:8 discussion 45:19 disease 14:12 disinfect 83:6 dispute 102:9 103:4,8,21 disqualificati... 112:9 disqualify 112:22 114:12 distance 29:19 district 1:1,2 disturb 77:25 divide 30:16 division 1:3 99:8 document 17:2 17:9,10,14,22 18:2 57:5,8 58:3 59:25 60:5 61:5 63:20 64:6 69:17,20 70:9 79:14,16,19,21 85:2 91:22 documentation 32:15 34:10 69:4,8 98:10 documented 32:3	documents 12:2,4,12 17:7 35:23 39:4 81:10 82:1,2 94:6 dogs 109:19 doing 25:25 26:1 32:23 91:8,10 dollar 45:5,9 dollars 42:5 door 82:12,24 doors 82:7 downtime 72:19 73:14 drier 74:11 drinker 75:2,3 drinkers 52:20 drive 79:2 driver 99:13,14 100:5 driving 29:21 dry 74:6 ducks 109:21 duly 5:4 6:8	easier 7:4 eat 86:22,22 eaters 78:1 eggs 109:25 eight 9:24 58:5 58:7,12 67:4 73:16 87:20 eighty 96:6 either 22:18 56:19 70:15 86:2 88:14 96:11 electrical 37:14 email 8:21 68:18 emailing 8:13 emails 31:15 107:11,12 emily 3:4 5:21 6:16 emphasis 77:9 employed 13:10 empty 89:16 100:21 enforce 25:14 ensure 14:8,24 90:25 ensuring 21:7 21:20 25:3,18 enter 44:17 entire 27:5 environment 76:15,19	equipment 27:12,15,16,18 27:20,22 36:19 36:21,25 37:2 37:4 46:18,21 47:6 48:4,5,6 49:13 55:8 83:3 104:14,19 104:20,25 105:5,13,24 errata 115:11 115:13,16 esq 115:1 esquire 3:4,5 3:11,16 ethics 112:25 114:14 evaluate 73:2,3 evers 62:10,17 63:1 evidence 95:1 114:9 exact 67:17 examination 2:2 5:11 6:12 108:4 examined 6:8 example 22:20 44:20 48:18 109:11 except 81:18 112:12 exception 7:17
	e 2:1 3:1,1 116:3,3,3 earlier 32:6 46:17 63:11 69:3 73:11 93:3 100:25 106:22 108:13		

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[exchanged - farms]

Page 9

exchanged	f	26:18,24 29:4	38:8 42:4,7
107:12		30:19 34:4,13	44:6,16,20
exercises 92:14	face 89:25	34:16 35:8,10	45:22 46:15
	90:21	35:15,16,22	47:5,24 48:20
exhibit 2:8,11	fact 53:25	37:2,4,20,21	49:2,20 50:24
2:14,16,19,23	97:14	40:8,22 43:20	51:6 52:25
16:17 17:1	factor 52:10	46:1,12,22,23	64:17 65:2
56:20 57:4	fails 115:18	47:21,22 48:22	67:25 75:1
59:17,21 63:15	fair 8:3 51:5	52:7,9,12,16,18	76:21 81:21,22
63:20,24 64:3	fairmark 3:12	52:21 54:1,2	82:8,20 93:25
69:10,16 79:10	fall 12:22	56:8 59:1,9,16	95:3,9,24
79:15	104:12,24	60:8 63:4,5	100:3
exhibits 2:6	105:9	64:14 65:14	farmer's 43:24
113:19,20,23	familiar 9:18	67:19 68:9	46:6
exist 51:21	36:11 42:18	69:1 70:6,19	farmers 9:10
expect 11:5	47:10 55:25	70:23,25 71:25	14:20 15:2,15
24:13,23 33:24	58:15 62:9	72:11 73:6,20	15:19 22:24
38:8	98:12	74:17 76:21	23:17 24:2,13
expected 40:4	fan 74:9 83:22	78:5 79:3	24:23 25:4,19
63:6 64:19	106:15,16	85:18,19 89:7	27:12 28:3,8
78:8	fans 84:3,6,8,9	90:25 91:18	35:5 38:14
experience	84:9,10,13	95:1 98:2,4,6,8	41:5,22 44:3
12:24 26:13	85:12,13	99:1,2,15	50:16 54:15,20
expiration	105:16	100:8,9,11,19	54:24 58:13
114:24,25	far 11:5 19:17	100:23 101:2	59:4 62:20
explain 41:16	29:18 78:19	104:10,15	63:13 64:19
expressed	farm 9:18,21	105:12 107:1	65:11 74:14
102:1	10:2,7,12,16,21	109:7,11,15	75:18 82:20
extent 97:18,23	10:22,25 12:8	110:5,10,23	85:1 97:3
103:23 104:6	15:8,16 16:5	farmer 9:17	101:1 102:22
extra 76:11	18:9,20,22,24	13:23 15:17	109:10
78:16	19:1,6,17 20:5	18:25 19:17	farming 36:19
extreme 95:9	20:13 21:14	20:14,21 25:25	farms 10:9
eye 33:12	24:3,10,11	33:24 34:5	14:13 16:13

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[farms - forms]

Page 10

19:14 21:16,18 27:11,18,19,21 28:1,2,8,12,18 28:25 29:10,14 29:16 30:9,10 31:23 32:4 34:11 35:6,23 36:20 37:12,13 45:1 46:17,20 47:1,2 48:23 54:8 65:13 69:5 74:2,15 74:16,16,24,25 75:1 78:9,10 82:10 94:24 98:3,11 110:14 110:14,17 federal 5:7 feed 13:24 36:21,25 52:5 76:9,12,13,18 76:20,21,23 86:4,6,6,15,21 87:2 105:16 feedback 67:23 68:1 feeder 83:11 85:23,24 feet 66:13 field 70:13 file 35:24 fill 69:24 81:21 filled 80:9,18	financial 112:9 fine 9:14 61:18 finish 6:25 7:2 33:6 97:9 103:17 firm 5:25 20:22 113:5 first 6:8,18 17:17 18:1,7 20:10,12,17 42:10 43:5 67:14,21 72:6 81:8 five 95:4,6,11 95:12 fixed 105:1,5 fixing 106:5 flock 2:8,11,23 12:9 13:5,5,15 15:17,18 16:12 17:22 20:1,8 20:11,12,17 21:5 25:19 26:7,24 27:3,5 27:7 28:13 32:6 35:21,25 36:2,4,5,10 40:10 41:12,14 42:19,22,25 43:6,6,7,8,9,16 43:21,23 45:4 45:16,20 46:1 46:2,13 49:25 50:1,25 51:1	51:25 57:11,20 57:21 58:1,7 59:2,7,9 61:1,2 61:3 65:17,21 65:24 68:15 69:25 70:3,7,9 70:10 71:8,9 71:10 72:10 74:12,18 75:15 75:15,17,19,22 76:17 80:3,9 80:11 81:4,19 81:20 82:5,19 83:2 91:16 94:24 98:7 109:22,24 110:4,11 flocks 43:1,2,4 43:10,11,16 72:19,20 73:7 73:15,18,24 74:9 75:4 90:4 flow 23:5 flu 46:11,14 flush 75:2 flushed 74:23 flushing 74:19 follow 40:5,9 92:2,18 108:7 109:9 111:1 followed 21:22 25:4 following 5:11 108:10 112:2	follows 6:9 foods 1:11 3:23 6:2 115:4 116:1 117:1 foot 82:6,11,13 82:21 foregoing 114:4 117:5 forget 85:10 90:8 91:5 forgets 90:18 91:14 forgot 90:10 form 12:7 19:23 21:23 24:15 25:5 33:5 34:22,22 35:2,6,7 37:5 37:18 38:5,16 39:23 51:9,17 51:22 53:2 54:4,16 57:22 60:13 62:4 63:9 66:15,15 66:22,23 67:2 68:5 70:17 71:2,22 72:4 78:13 86:19 89:3 93:18 94:18 96:17 97:7,17 forms 66:3,21 80:19,23 112:7
--	--	---	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[forsyth - habit]

Page 11

forsyth 50:10 50:15 51:24 forth 41:24 found 95:3 four 47:18,21 48:8,10,25 49:19 53:17,21 53:23,24 60:23 66:12 73:17 76:13 80:22 87:2 88:1 89:21 90:15 91:6,7 fourteen 73:15 fourteenth 3:7 fowl 109:21 frame 29:1,11 30:22 67:19 frequently 68:21 fresh 82:17 full 65:21 fully 9:1 function 85:15 further 29:17 29:23 111:4 furthest 29:20	105:22 generally 11:12 24:11 26:22 31:25 67:22 80:13 generator 92:3 92:12,14 georgia 1:2 3:9 3:21 4:4 5:5 9:22 10:3 50:10 112:4,15 114:24 getting 45:3,6 79:6 93:7 104:8 109:25 give 7:8 16:21 23:16 32:10 34:4,6 46:2 56:24 64:21 69:9 given 6:19 24:1 24:7 114:10 117:9 go 14:15,16 31:18 44:9 45:7,14,16,20 54:11 56:17 61:20 64:23 66:8 70:23 73:5,6,6,19 87:25 88:22 90:6,10,19 91:2 106:14 108:9 110:20	goal 24:18 goats 109:12,14 goes 29:18 58:5 82:12 86:24 going 6:21,22 9:7 12:17 13:13 16:20 18:22 19:8 28:5 36:9 53:20 54:11 56:15,23 57:18 63:18 64:12 67:11 74:5,6 78:20,22 79:14 82:25 83:1,4,5 84:8,9 86:22 86:23 91:20 94:21,22 96:10 good 5:20,24 6:14 7:6,22 14:10 24:18 40:10 61:10 79:2 90:16,25 grass 77:4,12 77:14,16,22,24 78:5,6,7,15,18 78:24,25 79:9 92:1,8,9,11 great 7:11 group 15:14 grow 15:6 24:18 25:22 31:19 36:5 42:10 43:2,3	49:21,25 51:7 grower 35:24 growers 9:10 41:1 57:21 108:14,23 growing 68:8 96:19 97:1,5 97:14,21,22 98:2,5 107:3,5 grown 43:2 51:13 grows 49:1 106:24 growth 86:21 guess 94:25 guessing 19:1 guide 92:20 93:9 94:5,7,15 guideline 23:10 23:13 92:21,23 93:1 guidelines 24:4 24:14 38:12 63:12 92:3,19 93:4,16 108:14 108:15,16,17 108:22,25 109:1,2,4 guides 85:18
g			h
gain 40:12 86:23 gas 95:17 general 22:6 28:9 105:15,19			h 116:3 habit 91:8

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[hand - indirectly]

Page 12

hand 56:17,17 64:23 handles 55:23 happened 90:8 110:9 hard 6:24 harvest 27:2 98:12 haul 98:13,18 98:19 99:7,10 99:13 100:1,4 100:7,18 101:5 hazel 9:19 10:20,24 16:10 17:16 18:14,16 18:19 20:25 21:2 24:5 29:2 29:16,23 38:4 38:10 39:2 40:4,8 61:5,6 63:2,5,6 67:13 67:18,22 69:9 70:6,10 78:9 79:24 84:12 85:21 105:5 110:4,10 head 7:10 32:8 health 13:25 14:2,6 26:2 62:23 86:20 hear 17:4 56:15 height 83:11,11 85:23,24 86:11	held 13:15,17 45:19 help 17:6 18:9 18:21,24 19:1 36:24 74:11 76:15 82:8,21 helper 18:21 hereto 117:7 hey 91:12 95:9 high 86:2,4 higher 46:22 47:5 48:21 49:3 86:10,11 hillsboro 10:2 10:7,13,17,22 hire 30:14 hired 30:19 historical 94:25 94:25 95:1 history 98:1 home 109:23 horses 109:14 hot 64:15 94:12 95:10 96:11 hour 11:22,24 11:25 12:1 hours 71:11 72:7,9,17 73:22 92:16 house 22:17 23:20 24:10,12 27:21,24 37:21 38:25 45:24 48:3 50:19	55:2,12 72:22 74:3,8,11 75:5 76:6,8,16 77:24 78:2,24 84:11 85:14,18 85:19,19 86:14 88:2,4,23 89:22 90:7,14 106:14,15,15 106:16 109:16 109:17 houses 27:22 49:14,16,20 50:16 51:7 53:15,16,21 72:11,13 76:12 housing 47:16 49:9 huh 77:1 hundred 66:13 husband 90:13 husbandry 89:6 i ideal 93:12 identical 47:3 identification 16:19 56:22 59:19 63:17 69:12 79:12 identify 17:7 illness 34:24	imagine 107:18 impact 47:23 48:1 impacts 114:20 impartial 114:21 impartiality 112:24 114:13 importance 77:11 important 7:8 100:24 improvement 52:9,12,18,21 53:9 54:1 96:15 97:4,16 improvements 52:7,17 53:10 53:18 inch 60:23 included 25:1 including 38:1 85:21 increase 94:9 indicate 80:7 indicated 102:8 102:17 indicating 17:8 70:12 indication 91:19 indirectly 31:12
---	---	---	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[individual - kritika]

Page 13

individual 27:21	inviting 77:15	75:8 77:5,16	61:10 64:24
individually 15:16	involve 14:4	78:6 79:3 84:3	65:3 66:12
individuals 9:12,16 18:18 19:5 38:9	involved 44:1,5 44:23 45:13	92:2	67:3 68:9
industry 25:11	issue 101:4	keeping 39:17 78:7 105:24	73:21 75:20 76:16 77:15
infestation 77:17	item 65:19 67:9 67:10 72:25 73:1 81:8 82:6 87:12	kind 13:20 14:22 26:9 32:14 46:5 56:17 58:23 85:1 90:20 100:2 108:9 110:15,15,16	80:9,10 87:22 87:24 88:5 90:2,9 91:5,20 94:5,25 95:7 96:2,5,23 97:20,25 98:1 98:3,5 100:2,3 100:16,22 101:7,16,16,20 101:21 102:4 102:11,12,12 102:13,24 103:3,10,12 104:8,13,14,16 104:21 107:4,6 108:19,21 109:6,23 110:12,12
information 26:18	items 60:11 64:20 72:4 76:1 80:25 82:5	klorfein 3:5 5:22	knowledge 10:6 97:24 101:18 103:15 103:19 104:23 110:9
initially 42:9 58:9	j	knew 105:4	known 27:3
injury 88:16	james 1:16 5:9 5:16 6:7 115:5 116:2,24 117:2 117:4,12	know 7:25 10:5 11:9,22 13:23 14:9,15,22,25 16:5 20:7 22:14 24:22 25:12 26:9 27:14 28:12,19 29:8,18,24 31:14 33:21 34:9,23 36:3,3 37:15 38:18 40:14 41:10 42:7 44:16,25 45:1,2,6,10 46:10,13 48:1 50:11,14 51:20 51:24 53:13 54:7,21 56:14 57:12 60:17	krishan 3:25 kritika 3:11
inspected 90:4	jarred 3:5 5:22		
insulation 76:7 78:23	job 14:11 21:7 21:12,20 25:3 25:18 26:9		
interact 68:17	joined 5:22		
interest 62:23 112:10,20 114:11	judicial 4:4		
interested 11:19	july 92:23		
interject 63:23	jump 108:7		
interrupt 23:4 63:23 97:11	k		
interrupted 20:20 95:22	kathryn 30:25 31:1,21		
interrupting 11:15 23:7	keep 24:20,21 24:21 33:12 35:6 37:1 39:14 74:11		
introduce 5:17			
introduced 6:15			

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[labeled - mailbox]

Page 14

l	legal 112:17 113:6 115:23 letter 96:22 letters 77:3,8 92:1 letting 13:22 level 49:11 78:8 levels 48:16 licensed 5:4 light 23:9,11 76:14,18 lighting 22:22 22:25 82:3 108:15 109:4 lights 85:5 liked 33:11 likes 32:25 line 75:8 86:15 116:4,7,10,13 116:16,19 lines 74:20 75:2 75:3,6,9 76:12 105:16,17 109:12 list 59:10 60:8 60:12,18 64:20 64:22,23 65:1 65:9 77:21 80:22 literally 56:6 litigation 17:6 litter 72:22 74:6,18	little 6:24 11:25 20:6 23:24,24 65:8 75:24 84:16 85:4 87:8 108:8 109:22,24 livability 52:5 live 55:24 98:13,18,19 99:7,10,13 100:1,4,7,18 101:5 llc 1:11 3:6 115:4 116:1 117:1 llp 3:12 ln 2:3,7 load 100:21 locations 28:3 log 34:15 35:12 35:17 81:9,21 81:25 92:3,12 92:15 logs 34:13 35:14,20,22 long 11:21 51:11 70:21 82:4 longer 96:18,25 97:14 106:23 look 34:25 45:7 45:9 65:6,9 79:2 81:22,24 85:11 86:12,13	86:14,15 87:25 88:23 91:3,18 110:15 looked 32:6 looking 21:14 32:21,25 57:19 86:7,8 90:7 looks 17:16 57:24,25 80:1 83:17 87:22 92:8,22 lose 45:24 79:8 lot 14:5,14 22:13,16 25:8 26:14,16 29:20 53:21 59:5 62:1 66:24 83:22 104:13 104:14 lots 102:21 loud 32:11 low 86:2 lower 48:10 lowered 95:10
		m	
		m 3:16 115:1 macon 1:3 made 4:1 33:13 33:22 112:3 113:19 114:19 117:5 mailbox 81:9 81:10,24	

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[maintained - nash]

Page 15

maintained 35:23 77:5,16 78:6,7 92:2 maintaining 112:23 114:12 make 7:4,14 11:15 32:24 33:19 49:18 55:15 64:13,14 85:11,13 96:4 104:10 106:14 112:18 makes 30:11 55:14 88:3 90:5 91:20 97:15 making 14:11 46:3 106:11,12 112:22 management 56:1,5 84:1 manager 31:19 49:10 manufacturer 55:8,14 manufacturers 37:8 55:13 mark 83:20 marked 16:18 17:2 56:21 59:18 63:16 69:11 79:11 market 25:23	marking 17:1 57:4 59:21 63:19 79:15 marks 90:4 match 99:22 matter 112:21 113:9 114:11 mcgalliard 1:22 5:1 114:23 mean 12:6 16:13 18:16,18 21:9,25 22:13 23:4 25:7,12 26:21 27:8 28:3 30:4 31:15,18 37:1 38:13 47:19 48:25 50:7,9 50:12 54:18 58:23 66:21 67:24,25 68:1 71:6 72:8 78:19,20,23 80:12 81:18,20 86:24 92:22 95:15 104:17 means 8:14 29:5,6 72:9 78:4 114:7 meant 19:3 96:7 measure 76:6,8	medications 9:4,6 meetings 15:15 mentioned 17:18 21:16 23:11 26:12 30:8 31:22 59:13 88:18 93:3 99:3 106:22 message 8:13 91:24 messages 107:12,13 met 76:2 middle 1:2 83:7 83:9 milledgeville 9:22,25 10:21 10:25 28:5 minimum 76:1 76:3 91:2 minute 20:7 61:19 66:13 74:10 minutes 74:10 mirror 110:16 mizell 31:1 moment 16:21 56:24 69:9 monday 87:24 money 40:23 48:15,15 60:25	monitor 85:10 88:23 monitors 55:3 montezuma 28:6 month 67:17 monthly 34:8 morning 5:20 5:24 6:14 mortality 52:5 87:13,18,25 88:9,19 89:8 89:12,17,21 90:1,21 motor 85:16 move 48:20 49:2,3,6,7 74:5 moved 52:22 73:22 movement 2:19 71:3,7,12 72:5 moves 52:25 71:10 72:10 mowers 78:1 multiple 49:21 n n 2:1 3:1 name 6:15 28:22 70:3,6 107:1 names 37:8 nash 3:17
--	--	--	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[nature - okay]

Page 16

nature 108:9 ne 3:7,19 necessary 117:6 need 7:17 40:12 59:7 64:24 72:11 77:4 82:17 84:3,8,9 85:13 86:5 88:17 91:12 92:1,2,3,18 96:4 109:15,20 109:24 needed 19:16 33:20,23 49:11 84:12 104:25 105:5,8 needs 29:8 72:11,24 84:19 90:23,24 92:13 104:21 negotiate 41:8 neighbor 47:6 never 62:10,17 62:25 99:25 101:22 102:1 106:25 new 18:21 30:14 52:20,20 92:2,25 93:1,1 93:2 newer 47:22 48:3	nice 61:12 ninety 96:7 nodding 7:10 nods 32:8 normal 77:4 105:16,20,22 106:12 normally 46:3 82:25 norris 1:16 5:9 5:16 6:7,14 11:9,18 16:22 17:3 33:5 56:25 57:7 60:1 61:16 62:1 64:5 69:13,19 79:18 96:13 97:8,19 102:14 104:9 107:7,25 108:6 108:12 110:3 110:25 111:4 115:5 116:2,24 117:2,4,12 notary 1:25 114:25 117:13 117:19 notations 106:12 note 23:5 33:4 33:22 115:10 notebook 23:25 noted 117:7	notes 33:19 91:24 notice 75:16 noticing 113:8 noting 91:11 number 1:5 17:7 24:10,12 28:17,23 43:3 57:5 63:21 69:17 75:19 81:10 87:21 89:11 90:11 99:5,17,20,21 99:22 101:5 numbers 17:5 44:18 45:14 85:20 87:19 88:3,6 90:6,17 91:4,17,21 99:6,11 nw 3:13	objection 5:18 23:3,6 33:5,14 57:22 68:5 94:3 103:22 104:5 obligation 112:24 114:13 obviously 49:17 71:15 76:20 86:9 109:18 occurred 103:21 ocga 112:8,11 113:10 odd 75:19 officer 114:21 officials 101:4 ogletree 3:17 5:25 ogletree.com 115:2 okay 6:21 7:7 7:23 11:1,13 11:17 19:8 25:16 33:9 36:6 43:22 56:25 57:17 58:15 61:8 67:11 69:13 95:7,12 97:12 98:9 108:3 109:5 110:8
		o	
		object 19:23 21:23 24:15 25:5 37:5,18 38:5,16 39:23 51:9,17,22 53:2 54:4,16 60:13 62:4 63:9 78:13 86:19 89:3 93:18 94:18 96:17 97:7,17	

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[old - perdue]

Page 17

old 66:15 older 47:20,21 77:25 84:2,7 86:9 once 19:25 20:3 20:3,6,8 21:14 21:17 29:25 31:23 45:8 92:13,14 110:10 ones 55:11 ongoing 14:23 58:9 91:15 open 8:19,21 81:24 operational 85:14 105:25 option 60:17 optional 60:12 oral 5:10 order 64:25 83:5 92:7 99:1 ordering 13:24 114:1 originally 20:5 outbreak 34:24 outreach 101:23 outside 35:10 46:5 55:6 78:2 84:17 95:4,8 95:18 oven 85:9	oversee 10:9,12 owed 41:1,22 own 1:6 owner 18:25 <p style="text-align: center;">p</p> p 3:1,1 p.c. 3:18 p.m. 111:6,9 page 116:4,7,10 116:13,16,19 paid 40:24 44:3 45:3,7 46:2,25 47:12 59:8,15 78:16 101:1 pan 82:11,13 82:16 83:1,5 pans 76:23 82:7,15,21 paper 108:25 papers 23:23 parker 1:6 5:21 5:23 6:17 10:1 18:17 19:4 24:8 25:1 38:9 67:13,15 68:18 89:25 90:20 96:14 97:14 101:3,14,19,22 102:2,7,16,18 104:3,10 106:2 106:23 115:4 116:1 117:1	parker's 10:18 10:21 part 14:11 15:21,24 21:7 21:12,20 25:3 25:18 39:5 42:15 53:11,12 62:13 75:9 76:4 78:10 86:25 87:15 88:19 93:4,7 99:9 participate 58:6 participates 60:9 particular 35:24 36:5 55:7,8 61:2 63:14 75:18 parties 3:2 113:12 114:1 114:21 partners 3:12 party 6:2 113:2 113:13 114:16 pass 79:3 password 113:22,25 past 52:14,16 53:7,8 patel 3:25 pay 41:9,20 44:1 46:1,12	46:22 47:5,7,9 47:11,12,13,24 47:25 48:3,9 48:10,10,12,13 48:14,18 59:12 60:10,16,19,21 76:5 78:16 paying 52:9 payment 41:1,3 41:5,11,13,19 41:21,23,25 42:13 43:14 44:1 54:10 peachtree 3:19 pending 7:21 people 31:16 90:10 91:5 109:18 percent 84:18 perdue 1:11 2:8 2:10,13,15,18 2:22,23,25 3:23 6:1 9:13 12:19,19 13:1 13:4,11 17:2,3 19:18 20:12,21 21:9 22:9 25:20 26:8 30:11 31:2 32:25 33:2,11 35:3,7,9 36:18 37:3,10 38:13 40:25 41:4,21 42:16 43:2,22
--	---	--	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[perdue - practices]

Page 18

49:12,25 50:12 50:17 51:1,6,8 51:11,16 55:20 57:5 59:24 62:2 63:21 69:17 70:23,24 72:1 76:20 78:20 79:5,16 81:25 83:3 96:16 97:5,15 98:11 100:12 104:3 106:24 107:5 108:14 108:22 109:10 115:4 116:1 117:1 perdue's 21:21 36:7,11 54:14 68:4 perfect 71:4,17 75:25 perform 40:11 performance 68:10 94:23 95:2 96:15 97:4,16 period 13:15,16 67:2 peroxide 74:20 74:23,24 75:23 perry 50:9 98:22 person 30:17 43:5 68:24	70:23 personal 110:9 personally 19:4 personnel 30:14 35:9,10 82:12 pertain 25:10 25:11 105:17 pertaining 61:5 pertains 36:22 pg 2:3,7 phone 68:24 physical 99:23 pick 87:19 88:5 88:22 89:14 picking 90:14 90:15 pipe 60:23,24 place 15:7 16:6 17:22 19:14,20 20:2,4 37:20 42:11,11 64:16 73:13 77:23 81:11 82:1 94:8 113:9 placed 19:22 20:13,18,22 21:1 69:25 71:14 72:18 92:10 96:14 97:3,16 placement 13:23 26:16,20 26:22 27:3	29:9 69:23 71:4,15,16,16 71:17,18,19,20 73:23 75:25 76:22 80:14,15 92:9 104:11 107:1 places 73:20 plain 14:5 plaintiff 1:9 3:3 5:21,23 6:17 plaintiff's 2:6 16:17 17:1 56:20 57:4 59:17,21 63:15 63:20 64:2 69:10,16 79:10 79:15 plan 96:15 97:4 97:16 plant 98:23 100:14,14 please 5:17 6:5 7:25 point 16:7 61:11,11 68:25 92:11,21 96:20 108:19 109:5 110:3 pointers 24:19 policies 21:21 21:25 22:5,9 22:12,25 36:7 36:11,15,18	37:17 39:21 54:14 62:14 108:20,21 policy 36:23 37:9,19 38:3 39:18,20 62:3 population 79:4 positive 67:23 possible 50:2 72:14 74:4 post 2:19 71:3 71:7,11 72:5 73:23 posted 23:19 23:19 24:4 85:17 92:20 postplacement 71:5 poultry 9:12 10:19,21 12:25 18:8 26:10,13 42:16 50:19 51:7 58:16 89:2 pound 40:24 41:14,15 42:6 47:12 48:3 powdered 82:15 practice 56:6,7 72:13 93:21 practices 56:1 74:3 84:1
--	---	---	--

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[preach - question]

Page 19

<p>preach 76:17</p> <p>precisely 102:15</p> <p>preparation 63:13</p> <p>prepare 11:2 38:14</p> <p>prepared 64:14 69:4 74:12</p> <p>preparing 11:21</p> <p>preplacement 71:4,13</p> <p>prerequisite 77:19</p> <p>prerequisites 60:20</p> <p>present 3:22 70:13</p> <p>pressure 23:10 23:13 76:2,3,5</p> <p>pretty 54:9 85:6 89:4 96:8 96:8</p> <p>previous 43:1 43:10,16 71:8</p> <p>previously 35:1</p> <p>primary 27:25 68:25</p> <p>print 71:24</p> <p>printed 23:19 99:25 100:10</p> <p>prior 26:13 104:11</p>	<p>probably 29:12 30:24 68:23,24 78:5 84:24</p> <p>92:20 93:9</p> <p>95:6,12 105:15</p> <p>problem 46:10 64:4 88:16 110:1</p> <p>procedure 5:7</p> <p>procedures 62:8,15</p> <p>proceed 6:11</p> <p>proceeding 113:15,24 114:10,19</p> <p>proceedings 5:12 112:19</p> <p>process 17:6 39:5 40:6,9 49:8 58:16,22 75:6</p> <p>processes 14:15 14:19</p> <p>processing 100:14</p> <p>produce 9:12 25:19 44:17</p> <p>produced 35:2 61:4 99:1 113:15</p> <p>producer 42:12 42:12,16 70:13 70:17,20,21 87:15 89:2</p>	<p>producers 9:10 68:12</p> <p>product 55:14</p> <p>production 12:25 26:13 83:8 86:17,25 93:13</p> <p>professional 1:24 5:2 112:25 114:14</p> <p>program 58:16 58:19,21,23 59:4</p> <p>programs 8:19</p> <p>prohibited 113:10</p> <p>prohibitions 112:12</p> <p>propane 95:16 95:19</p> <p>properly 104:15,19 106:7</p> <p>property 110:2</p> <p>protected 113:22,25</p> <p>provide 25:21 35:18 82:10,13 82:14 113:7</p> <p>provided 5:6 38:3 63:2 74:24</p> <p>provides 108:23</p>	<p>public 1:25 117:19</p> <p>purpose 19:11 32:18 33:18 34:17,20 37:16 39:13,22 86:16 100:16</p> <p>pursuant 4:2</p> <p>put 23:3 42:24 55:12 75:12,13 76:22 78:3 86:3 96:6 106:17</p> <p>puts 76:21</p> <p>pvp 2:14 58:19 59:11,13 60:4 77:5,20 78:16 92:7,8,12 93:8 93:10,15</p>
q			
<p>qualifications 26:5,6</p> <p>quality 73:2,3</p> <p>quarterly 52:1</p> <p>question 6:18 7:3,9,19,21,24 8:1,2 30:7 33:7 33:10 46:16 57:19 62:7 88:4 90:3,19 97:9 102:15 103:18 105:3 109:10</p>			

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[questions - related]

Page 20

questions 7:1 8:6 9:1 11:12 12:18 13:14 21:5 26:3 29:7 36:6 47:8 54:12 67:12 72:3 98:10 107:19 108:1,7 108:11,13 110:25 111:2,4 113:17 114:6 quick 61:12 109:9 quote 108:21	64:9 ready 40:15 64:11,13,25 74:17,18 really 23:1,8 28:22 29:24 34:14 35:7 36:1 43:8 53:17 59:5 64:22 71:7 73:8 79:3 80:8 82:5 86:25 90:2,22 91:13 realtime 1:23	61:6 65:1,12 66:2 67:22 78:15 received 55:18 receives 48:9 48:13,14,17 100:6,12 113:13 receiving 54:1 60:21 104:11 recess 61:23 107:22 recollection 18:13 recommend 95:5 recommenda... 18:7 record 8:15 23:4 33:8 45:18 61:20,22 61:25 87:18 91:3 97:11 102:23 107:21 107:24 111:7 112:18,23 113:16 114:9 recorded 87:13 87:21 102:25 103:10,11,15 103:20 recording 88:18 89:8 102:6,10,16,17	102:20 103:5 103:12 recordings 103:13 recover 74:7 redundant 58:24 refer 9:16 10:15,24 17:4 42:21 43:12 52:17 73:25 87:14 88:6,11 101:9 referenced 115:6 referred 98:17 108:15,20 referring 47:7 refers 42:22 48:7 71:17 74:1 reflects 99:17 refresh 18:12 refreshed 82:18 refresher 65:9 region 28:15 registered 1:24 5:2 regular 31:17 regulations 4:3 112:6 related 15:3 22:3,4,10
r	5:3 rearview 110:16 reason 8:25 97:13 101:15 115:11 116:6,9 116:12,15,18 116:21 reasons 95:20 recall 67:1 101:24 103:25 104:2,7 106:10 108:12 receipt 115:17 receive 40:22 42:5 46:22 47:5 48:2,4,8 52:1,12 53:5 54:7,24 60:10 60:16,19,25		
r 3:1 116:3,3 raise 50:17,17 50:20,23,25 ran 92:16 93:10 range 94:17 95:4 rats 77:17 78:21,22 reach 86:4,5 102:13 reached 102:2 102:8,18 read 44:15,19 57:25 115:9 117:5 readiness 2:16 39:9,12 40:6			

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[related - role]

Page 21

39:21 44:23 87:3 104:25 relating 113:23 relationship 112:20 114:11 remain 81:1 remember 16:16 68:15 75:17 105:13 reminder 32:10 33:6 97:8 remote 1:18 5:8 5:15 8:5 remotely 3:2 5:19 remove 72:12 74:4 removed 72:24 repair 104:16 106:5 repaired 104:22 105:8 repairs 104:10 104:24 105:20 105:21,23 106:3 rephrase 8:1 46:16 89:19 105:2 replaced 82:19 104:22 105:8 report 17:15,16 30:21 31:4,7 31:11 32:7	33:17 112:21 reported 1:21 reporter 1:23 1:25 4:1 5:2,3 5:4 6:5,10 7:4 7:12 11:7 63:25 112:1,9 112:14 113:18 113:21 reporter's 114:2 reporting 4:3 112:6 113:7 reports 12:4,5 12:9,14 31:9 31:11,15 32:19 33:13 34:2 106:4,13,18,19 106:21 repository 113:25 represent 61:3 representations 112:2 representative 6:3 33:2,12 70:24 representing 6:1 request 44:20 require 37:3 38:13 required 35:5 48:24 55:22	94:16 95:25 104:24 117:13 requirement 19:21 20:16 78:12 89:9 91:2 requirements 2:20 22:19 49:13 54:14 65:10 71:3 72:5 76:2,3 93:17 requires 36:10 requiring 36:19 respond 11:11 97:10 responding 33:7 response 7:9 responsibilities 13:20 27:6 28:10 responsible 22:5 28:14,21 29:5 rest 56:13 retired 30:15 30:17,17 return 21:4 115:13,16 review 12:2,11 44:13 45:12 69:7 115:7	reviewed 20:6 revision 57:14 66:25 right 12:20 15:20 17:7 19:7 28:21 31:24 36:12 40:18 46:18 59:22 60:22 61:15 69:5 70:10,12,14 71:1 76:13 77:7 78:2 79:7 83:16,24 84:18 86:14 87:7 92:6 96:13 101:1 105:6,7 ring 23:25 road 64:12 roadmap 24:20 roberts 30:24 rodent 37:9,11 37:14,15,19 79:3 108:17 rodents 38:2 77:15 78:21 roger 1:6 5:21 5:23 115:4 116:1 117:1 role 13:3,5,7,8 13:15,17,20 21:5 26:7 27:25 28:13 36:10
--	--	---	--

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[roles - settled]

Page 22

roles 31:5 ronco 85:8 room 8:8,10 24:9 rooms 38:24 39:2 63:4 rotate 51:3 rotating 49:24 50:24 51:14,19 rotem 55:9 roisserie 85:9 route 16:14,14 28:16,20,24 29:2,4,11,18 30:2,4,8,10,16 30:18,20 31:23 45:2 54:3 routes 28:4,7 110:7,13 routine 105:20 105:23 row 18:1 81:7 83:7 87:6 rpr 114:23 rules 4:2 5:7 6:22 68:4 112:5 run 74:9,10 83:25 84:13,15 84:15,16,17,25 92:14 93:21 running 84:23 85:13	runs 85:5,7,7 s s 3:1 116:3 safe 58:11 sanitation 75:10 sanitize 75:3,9 save 35:20 36:1 72:1 95:16,17 95:19 saw 12:3 16:6 saying 7:5 91:12 103:2 says 18:8,20,24 34:21 64:10 65:19 66:12 70:6 71:10 72:6 73:1,8 74:21 77:3 81:9 83:10,24 83:24 84:19 86:25 87:12,25 88:9 89:17 90:3,4 94:8 108:25 109:1 scales 98:22 100:2 schedule 21:17 23:9,12 41:6 41:11,13,25 42:8,13 49:25 50:25 51:14 100:3 107:1	schedules 13:23,24 41:3 44:2 scheduling 26:15 science 26:11 26:11 screen 12:3 16:21,23 19:9 56:23 57:1 59:22 63:18 69:14 79:13 scroll 58:2,4 80:2 season 38:15 93:2 seasonal 38:12 63:12,12 second 43:8 82:6 87:12 100:15 108:10 seconds 83:24 84:5,13,23,24 section 18:2,6 76:25 91:23 112:8 sections 71:2 112:11 secure 24:22 security 14:25 62:14 see 16:22 18:4 18:10 28:7 44:25,25 49:10	56:25 57:2 58:3 59:22 64:17 65:17,22 69:13 70:2 83:13,23 92:5 96:22 104:21 106:13 107:1 seen 17:10 57:7 59:25 64:5 69:19 79:18 sell 98:4 send 99:1 sense 7:14 sent 115:14 separate 99:8,9 separately 87:13 serve 33:17 39:13 100:17 114:20 service 12:4,5 106:4,12,18,19 services 113:7 serving 28:1 set 11:6 41:24 55:1 85:6,9 setting 15:14 49:13 87:11,11 95:11,19 settings 38:20 38:22 39:12 40:5 95:21 settled 45:8

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[settlement - statements]

Page 23

settlement 44:13 45:8,12	41:3,5 42:9,11 42:15 115:12	97:9 107:16,25 108:13 111:1,3	72:4 87:9 99:4 113:11
settlements 44:2,8,11 45:1	signage 81:10 signature 17:23	snow's 11:12 solely 113:3	specifically 25:9,13 67:13
seven 66:13 80:17 84:20,23 87:2 88:1 89:22 92:11	17:24 64:17 65:17 66:4 67:9 80:3,4,6 111:11 114:23	114:17 solutions 112:17 113:6 115:23	69:8 112:4 speculation 97:18
seventy 71:11 72:7,9,17 73:22	signed 42:13 65:14 115:19	somebody 33:1 88:24 91:14	speed 48:7 52:20 53:9,10 65:20,20,25 66:10,14
share 16:20 56:23 63:18 101:10	signs 42:4,7 similarly 1:7 simple 14:6 sitting 106:9	soon 72:14 74:4 sorry 14:18 20:20 23:2,6 44:9 46:15 63:22 66:8 73:1 89:19 95:22 97:11 110:20	spend 11:21 29:13,22 spent 29:20 spoke 101:22 spouse 90:15 spread 14:12 st 3:13
sharing 19:8 79:13	situated 1:8 six 27:22 42:19 42:22,25 43:1 43:7,10,11,16 43:23 45:16,20 46:1,2,13 68:15 90:15	sort 24:17,20 58:6,8 65:5 76:17 85:8 99:8 109:19 sound 7:6,22 sounds 47:9,9 southeast 115:15 space 65:16 66:3	stamp 17:3 stamped 79:16 stamps 17:5 standards 76:10 83:9 86:17 start 6:21 12:17 22:14 48:11 started 12:19 12:25 13:4 31:1 67:21 state 5:4 112:15 statements 44:14 45:13
sheet 69:24 87:18 115:11	sixty 83:24 84:4,13,24 size 86:8 small 91:19 smith 1:22 5:1 114:23 smoak 3:17 snakes 77:15 77:17 78:21 snow 2:4 3:4 5:20,21 6:13 6:16 61:9,14 61:19 64:2	special 91:23 specific 9:7 49:12 62:3	
sheets 35:22 shoes 83:6 short 86:3 show 15:5,12 15:15 16:9,13 55:15 79:14 100:4 showing 16:25 57:3 59:20 63:19 shown 15:10 16:15 20:13 shows 15:18 side 99:7 sign 34:15 35:8 35:8,15,16			

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[states - terms]

Page 24

states 1:1 101:11 static 76:2,3,5 status 32:22 stay 53:20 stayed 28:10 staying 54:9 stenographic... 114:5 step 83:1,5 steps 14:16,17 14:20 stewart 3:18 stick 94:20 stop 19:8 23:5 81:23 97:5 98:5 stopped 97:22 98:2 107:2,4 110:4,10 stopping 61:10 storm 45:25 street 3:7,19 stuff 22:3 60:9 73:9 78:1 81:19 104:21 subcontract 113:4 subcontractor 112:16 114:18 subject 40:25 submitted 113:18,20	subscribed 117:14 subsequent 80:20 successful 25:19 suite 3:8,20 summer 2:16 38:15,19,21 39:9 64:9,12 64:25 92:21 93:23 109:1,3 supervisor 31:6 34:7 35:19 57:13 80:3 supplemental 76:9 supposed 59:1 82:4 85:12 sure 11:15 14:12 16:11 31:1 32:20,24 33:11,13 35:25 46:11 64:13,14 66:17,18,20,23 67:16 85:11,13 89:4 96:4,20 96:23 107:2 109:8 surprised 91:13 survive 88:15 swapped 110:13	swear 6:5 sworn 5:19 6:8 117:14 system 47:10 t t 116:3,3 take 7:5,16,18 7:20 30:16 42:4 61:12,15 61:17 83:22 86:13 107:16 taken 21:8 61:23 107:22 114:4 talk 6:23 9:9 49:9 63:14 talked 11:4 35:21 36:8,14 46:17 51:15 62:1 63:11 68:23 100:5 109:6 talking 9:11 10:25 31:19 54:10 62:15 88:7 96:12 101:11,24 tall 77:14 tara 3:11 tare 98:23 target 40:13 task 73:4	telephone 31:15 tell 11:5 12:5 13:19 14:3 26:20 47:13,14 59:14 telling 104:2 temp 92:2 temperature 22:16,19,25 23:9,12 38:19 38:20 39:11 40:5 82:3 85:17,20 92:19 92:20,25 93:4 93:9,11,16,20 93:24 94:5,7 94:13,15,21 108:16,25 109:1,2 temperatures 39:7 55:3 85:5 93:23 ten 20:7 59:10 59:11 61:19 67:4 68:11 74:10 84:10 95:24 96:2,8,9 term 9:9 42:18 terms 9:8,15 26:19 43:17 71:6 79:5 98:15 113:3 114:17
---	--	--	--

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[tes - training]

Page 25

tes 1:5	30:23 33:10	48:9,10,12,13	times 26:16,16
testified 6:9	43:25 50:5	48:16,17,18,21	29:9,9 41:19
69:3 100:25	57:9 63:23	48:23,25 49:3	41:23 43:14
testimony 1:15	67:16,20 70:22	49:16,18,19	66:24 84:25
6:19 115:9,17	79:20 84:19	52:23,23 53:16	today 6:2 9:2
117:8	97:15,21,22	53:17,19,20,21	13:14 17:4
text 8:13 68:18	98:17 99:14	53:22,23,24	18:9 92:4
68:20 77:5	100:9,13	66:11,12 76:4	106:9 108:2
107:11,12	105:11 106:25	tiers 47:16 48:8	today's 5:13
thank 6:6,10	110:19,21	49:14 53:1,11	9:8 11:3 111:6
8:11,17,24	thinking 68:3	54:2	told 103:11
32:13 64:3	thirteen 110:14	tight 76:6	took 30:18
108:1 110:24	thirty 84:23	tightness 76:8	top 18:1 34:22
thee 90:14	thought 65:7	time 5:14 10:10	64:10 68:11,12
thereto 114:6	three 23:25	11:23 13:14,16	81:7 108:24
thing 13:9	47:17 48:25	20:2,10,12	tos 62:11 63:1
33:25 66:9	49:19 53:16,19	27:7 29:1,11	total 43:20
75:18 76:14	53:20 58:4	29:13,21,22	touch 104:8
91:15	72:16 73:19	30:22 42:10	traffic 25:7
things 14:24	80:22 81:4	49:22,23 55:9	trailer 98:24,25
15:1 30:1	84:9 88:2 91:7	61:21,24 67:1	99:4,6,11,17,21
33:20 49:18	thrive 88:15	67:19,20 73:7	99:23 100:21
58:25 59:7,10	throw 65:4	74:6,22 75:22	100:22 101:5
60:8,11 71:9	ticket 98:18,20	80:13,16 83:25	trailers 99:4
76:13 81:1,2,5	98:25 99:12,14	86:6 93:22	train 22:24
81:16 91:25	99:16,19,22,25	98:7,8 105:11	57:11,13,20,21
92:6 105:7,15	100:1	105:12 107:20	trained 15:7,9
105:16,17,19	tickets 98:13,13	107:23 108:2	18:24 20:19
105:20,23	98:19 99:10	110:22 111:6	55:4
106:12,13	100:6,7,17	113:13 115:18	training 2:12
109:12	101:6	timeframe	15:21,25 16:12
think 9:23,25	tier 47:7,9,13	115:8	18:9,14 19:4
10:11,14,17,18	47:17,17,17,17	timer 74:9	19:12,19,22
12:13 29:19	47:19,20,21,23		20:13,23 21:1

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[training - veritext]

Page 26

23:1,8 26:8,9 54:12,13,18,19 54:20,22,24,25 55:17 58:1,7,9 58:10,12 59:3 59:6 trainings 55:5 55:19,21 transcribed 114:7 transcript 113:14 114:8 115:6,19 117:5 117:8 transcription 114:8 transcripts 113:14,23 trash 81:9,18 81:19 trip 64:12 truck 65:4 98:22 true 113:15 114:9 117:8 try 29:25 75:17 95:11,16,16 trying 25:14 tunnel 65:21 turn 34:9 67:11 71:25 80:10 turned 65:15 100:15	twelve 28:24 29:10,12 84:10 110:14 twenty 73:16 73:16,17 87:2 95:17 twice 87:17 88:23 90:5 two 30:19 32:2 43:9 46:20 47:1,2,17 48:14,17,24 49:19 52:23 58:4 71:11,21 71:21 72:7,9 72:17 73:22 80:16,17,21 81:3 84:6,9,21 84:22 85:12 87:20 100:9 type 68:9 84:10 types 37:3 51:13 typical 21:17 typically 46:4 typo 96:6	underneath 72:25 73:1 understand 8:2 10:1 35:13 106:23 understanding 9:11 19:11 62:6 101:10 underweight 40:13,17,22 unhealthy 88:14 united 1:1 101:11 unsure 25:15 update 92:3 upgrade 52:20 106:8 upgrades 106:2 uploaded 113:24 usda 101:4,10 101:13,15,19 101:23 102:3,9 102:19 104:3,8 use 9:7,9,15 32:15 43:23 49:20 50:16 60:24 66:16,22 75:14 82:21 98:16 used 15:14 26:19 36:3 39:5 45:21,23	51:7 57:20 60:5,7 67:2 75:22 82:7 98:10 115:19 using 81:20 84:6 usually 9:17 30:13 45:4,5 45:23 48:7,22 52:19 55:6,13 56:14 80:17 81:23 82:18 91:14 96:9 106:4,5,17
			v
			v 115:4 116:1 117:1 vary 94:1 vendor 55:7 ventilated 73:24 ventilation 83:10,23 84:2 85:20 verbal 7:9 verbatim 112:23 verified 58:16 verify 58:23 73:2 115:9 veritext 3:25 112:16 113:6 115:14,23

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[veritext.com. - wiring]

Page 27

veritext.com. 115:15 versus 38:21 video 1:18 5:8 11:6 15:10,12 15:25 16:2,3,8 16:9 20:7 111:7 videographer 3:24 5:13 6:4 61:21,24 107:20,23 111:5 videos 15:19 videotaped 1:15 5:15 virginia 3:16 5:25 115:1 virginia.woot... 115:2 visit 12:8 16:6 28:25 34:16 35:9,10 visitation 2:9 2:24 12:7,9,13 17:15,16 32:7 35:21 79:24 106:20 visited 31:22 34:11 69:4 visiting 21:14 21:16,18 visitor 34:13 35:11,11,22	81:9,21 visitor's 35:17 35:20 visits 32:3,16 visually 86:7 86:13 vs 1:10 w wait 6:25 7:20 72:16,17 waiting 7:19 waived 111:11 wall 23:19 63:4 78:2 82:2 walter 3:23 6:3 want 9:8 21:4 22:14 23:5 38:1 44:12 45:6 49:4,7 55:12 63:14 64:13,14 69:7 72:16,17 104:3 wanted 11:15 109:9 wanting 29:8 wants 20:21 44:16 warm 22:18 warmer 93:11 washington 3:14 water 23:10,12 36:25 74:19	75:6,8,9,10 76:13,18 83:11 87:2 105:16 way 27:25 35:24 38:14 42:24 44:22 46:21 47:4 75:2,17 76:5,7 81:4 86:3 ways 56:4 we've 36:7 54:10 62:1,15 weather 39:16 40:15 64:15 92:24 93:2 95:8 weed 78:1 week 2:9,24 17:17 21:14,17 30:1 31:24,25 45:9 58:3,4,4,5 58:7,12 73:13 79:23,23 80:12 80:13,21,22,22 80:24 81:2,3,3 81:4,15 84:19 84:21 92:13,15 weekly 14:8 34:8 68:24 106:20 weeks 31:18 32:2 80:20 weigh 98:21 99:3 100:22	weighed 46:24 weight 40:12 40:23 41:17,18 41:22 43:13,13 43:18,20,20,21 46:25 86:23 98:23,24,25 100:19,20,23 100:24 101:2 welfare 14:1,2 14:6,9 18:9 22:6,8,10 36:15 37:22,25 39:18,25 40:2 54:19 55:18 56:10,14,16,19 71:5 75:7 87:1 87:4,7 93:5,13 went 28:4 52:19 wet 72:12,23,23 72:24 wide 96:9 wife 90:13 wind 66:14 windows 8:19 windrow 72:7 winter 38:15 38:19,21 92:23 93:23 109:4 winterization 39:9 wiring 78:22
---	---	---	---

James Norris
Parker, Roger v. Perdue Foods, LLC

April 8, 2025

[wise - zoom]

Page 28

wise 29:19 68:10 witness 5:10,18 6:5 11:13 32:8 33:9 61:18 108:3 115:8,10 115:12,18 witnesses 113:21 wonder 90:5 91:20 wooten 2:5 3:16 5:24,25 11:8,14 19:23 21:23 23:2 24:15 25:5 33:4,14 37:5 37:18 38:5,16 39:23 51:9,17 51:22 53:2 54:4,16 57:22 60:13 61:9 62:4 63:9,22 64:4 68:5 78:13 86:19 89:3 93:18 94:3,18 96:17 97:7,17 103:22 104:5 107:18 108:5 110:24 115:1 word 98:16 work 12:18 49:8 64:25	67:12 96:16 99:7,12,25 100:1,18 worked 18:18 working 12:19 13:1 18:22 67:14,21 83:3 104:15,19 106:7,14,16,17 works 41:16 47:14 write 7:12 90:6 90:9,10 91:12 92:15 writing 88:3 89:25 90:17,21 91:16,21 written 23:13 23:18 38:22 88:1 89:1,21 91:24 wrote 89:16,20 90:16 x x 2:1 42:5 y yeah 9:23 11:25 12:10 16:3 24:17 25:17 28:2,16 30:3 33:2,19 46:7 49:15 50:4,13 53:12	55:23 67:24 68:7 70:15 71:19 78:3 79:1 81:17 83:17 84:14 85:3 87:8 88:8 88:21 92:6 97:25 101:2,13 101:13 106:25 110:6 year 12:22 19:25 20:6,9 66:20,23 93:22 yearly 20:5 54:21 years 9:24 67:4 101:25 yesterday 11:4 yesterday's 90:11 young 83:21 z zero 89:10,11 89:12,13,14 zeros 89:15 zip 28:19 zoom 6:24 75:24
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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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